

## Gay Gibson

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**From:** Sarah Drummond  
**Sent:** Tuesday, 10 June 2014 8:50 a.m.  
**To:** Mailroom Mailbox  
**Subject:** TRIM: FW: Further Submission on Summary of Decisions Requested to Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan  
**Attachments:** 26052014.mb.FSubVariation1.docx  
  
**Categories:** Purple Category  
**HP TRIM Record Number:** C14C/91402

For trimming please

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**From:** Tami Woods  
**Sent:** Monday, 9 June 2014 5:09 p.m.  
**To:** Sarah Drummond  
**Subject:** FW: Further Submission on Summary of Decisions Requested to Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan

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**From:** Michael Bennett [<mailto:MBennett@fedfarm.org.nz>]  
**Sent:** Monday, 9 June 2014 5:00 p.m.  
**To:** Mailroom Mailbox  
**Cc:** Tami Woods  
**Subject:** Further Submission on Summary of Decisions Requested to Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan

To whom it may concern at Environment Canterbury

Please find attached a further Submission on Summary of Decisions Requested to Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan from the North Canterbury Province of Federated Farmers of New Zealand (Inc).

Please acknowledge so that I know the submission of the Federation has been received.

Kind Regards

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# Federated Farmers of New Zealand

## Further Submission on Summary of Decisions Requested to Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan

9<sup>th</sup> June 2014

**FURTHER SUBMISSION TO CANTERBURY REGIONAL COUNCIL ON SUMMARY OF DECISIONS REQUESTED TO PROPOSED VARIATION 1 TO THE PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN**

Form 6

Further submission in support of, or in opposition to, submission on publicly notified proposed policy statement or plan

*Clause 8 of First Schedule, Resource Management Act 1991*

To: Canterbury Regional Council  
17 Sir Gil Simpson Drive  
Christchurch

Name of further submitter: Federated Farmers of New Zealand

Contact person: Michael Bennett  
Regional Policy Advisor

Address for service: PO Box 20448 Bishopdale  
Christchurch 8543  
[mbennett@fedfarm.org.nz](mailto:mbennett@fedfarm.org.nz)

This is a further submission in response to submission/s made on the following proposed plan variation:

Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan

The following pages detail the specifics in relation to our support or opposition to various submissions lodged. Our further submissions include the particular parts of each submission supported or opposed alongside our reasons for that position and what decision we seek from the local authority.

I wish to be heard in support of my further submission.

\*If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Where Federated Farmers submitted on the same variation point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers views on points raised by other submitters.

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
52274	ANZCO, CMP Canterbury & CMP Rakaia	Entire submission	Entire submission		Oppose in part  Support in part	<p>The Federation generally supports many aspects of the relief sought because the submitter raises many excellent points that may well add value to the Variation.</p> <p>Notwithstanding its support, Federated Farmers opposes parts of the relief sought that relate to special dispensation or exclusions from Policies and Rules governing resource allocation among industry groups (water allocation and discharges if industrial and trade waste).</p> <p>The relief sought will have a negative outcome for other industry groups because it is likely to result in the plan taking a precautionary approach as those implementing it respond to the resulting 'gap' around the effects of abstractions and discharges associated with industrial and trade activities.</p>
52309	Ballance Agri-Nutrients Limited	<a href="#">V1pLWRP-766</a>	11.4.12	Retain Policy 11.4.12(c). Submitter seeks that the staged introduction of Farm Management Plans is retained without change.	Oppose in part	The timeframe for staged introduction of Farm Environment Plan in the Cultural Landscape Management Area is not realistic. Farm Environment Plans are not required or desirable for extensive dryland farms on light/free draining soil.
52309	Ballance Agri-Nutrients Limited	<a href="#">V1pLWRP-781</a>	11.1a	Amend definition of 'Good Management Practice Nitrogen and Phosphorus Loss Rates' as follows: "means nitrogen and phosphorus loss rates (in kilograms per hectare per annum) from a property (including losses below the root zone of a property) for different soils, rainfall and farm type <u>operating at</u> Good Management Practice, as <u>set out in Schedule 24.</u> "	Support in part	'Good Management Practice Nitrogen and Phosphorus Loss Rates' are otherwise undefined, leaving aspects of activities subject to a standard that does not yet exist.

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
52309	Ballance Agri-Nutrients Limited	<a href="#">V1pLWRP-782</a>	11.5.6	Amend Rule 11.5.6 as follows: "Rule 11.5.6 Despite any of Rules 11.5.7 to 11.5.13, the use of land for a farming activity in the Selwyn-Waihora catchment is a permitted activity provided the following conditions are met: 1. The property is less than 5 hectares; <del>and</del> <u>or</u> 2. The property is greater than 5 hectares but less than 50 hectares; <u>and</u> 2. The nitrogen loss calculation for the property does not exceed 15 kg per hectare per annum."	Oppose in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52309	Ballance Agri-Nutrients Limited	<a href="#">V1pLWRP-783</a>	11.4 Policies	The submitter seeks that the policy framework supporting Variation 1 be amended to include non-regulatory methods to further guide good management practice for phosphorus and sediment loss for the Selwyn-Waihora catchment. More specifically, the submitter requests the following amendment to Policy Section 11.4: "Method (a) By mid-2015, Environment Canterbury will further investigate, as part of the Matrix of Good Management Project, good management practices for phosphorus and sediment discharges within the Selwyn-Waihora catchment and that, where necessary, that any outcomes of this further work is included in Section 11 - Selwyn-Waihora of the pLWRP by way of a Variation or Plan Change in accordance with Schedule 1 of the RMA."	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52309	Ballance Agri-Nutrients Limited	<a href="#">V1pLWRP-774</a>	11.5.7	Retain Rule 11.5.7(4). Submitter seeks that the staged introduction of Farm Management Plans is retained without change.	Oppose in part	The timeframe for staged introduction of Farm Environment Plans is not realistic in the Cultural Landscape Management Area. Farm Environment Plans are not required or desirable for extensive dryland farms on light/free draining soil.
52309	Ballance Agri-Nutrients Limited	<a href="#">V1pLWRP-775</a>	11.5.8	Retain Rule 11.5.8(2) & (3) & (4) Submitter seeks that the staged introduction of Farm Management Plans is retained without change.	Oppose in part	The timeframe for staged introduction of Farm Environment Plans is not realistic in the Cultural Landscape Management Area. Farm Environment Plans are not required or desirable for extensive dryland farms

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
						on light/free draining soil.
52309	Ballance Agri-Nutrients Limited	<a href="#">V1pLWRP-776</a>	11.5.9	Retain Rule 11.5.9(2). Submitter seeks that the staged introduction of Farm Management Plans is retained without change.	Oppose in part	The timeframe for staged introduction of Farm Environment Plans is not realistic in the Cultural Landscape Management Area. Farm Environment Plans are not required or desirable for extensive dryland farms on light/free draining soil.
52309	Ballance Agri-Nutrients Limited	<a href="#">V1pLWRP-777</a>	Schedule 24 – Farm Practices	Submitter seeks Schedule 24(a)(i) be amended so as to define exactly what the phrase 'reviewed annually' applies to; and (b) That the phrase 'reviewed annually' be defined such that it is constrained to, in the first instance, an assessment of the input data necessary to run OVERSEER <sup>®</sup> for the property in question. Should the review of input data not accurately reflect what is happening on farm then the definition should require that the nutrient budget be updated using OVERSEER <sup>®</sup> or an 'approved equivalent model'. Should, however, the input data be accurate, the definition should enable a nutrient budget to stay in place for at least three years, at the end of which it would be formally revisited, updated and remodelled using the most appropriate model available. All updating of the nutrient budgets should be conducted by an appropriately qualified and experienced person.	Support in part	The relief sought will create efficiency with little or no reduction in effectiveness. An annual update of nutrient budgets will result in an excessive regulatory burden for the minor environmental gain that is actually achieved. The relief sought presents a better solution whereby updates will be 3-yearly or according to substantive change in the farm system.
52309	Ballance Agri-Nutrients Limited	<a href="#">V1pLWRP-771</a>	11.4.13	11.4.13(a) Submitter seeks that the staged introduction of Farm Management Plans is retained without change.	Oppose in part	The timeframe for staged introduction of Farm Environment Plans is not realistic in the Cultural Landscape Management Area. Farm Environment Plans are not required or desirable for extensive dryland farms on light/free draining soil.
52309	Ballance Agri-Nutrients Limited	<a href="#">V1pLWRP-772</a>	11.4.14	11.4.14 Submitter seeks that the staged introduction of Farm Management Plans is retained without change.	Oppose in part	The timeframe for staged introduction of Farm Environment Plans is not realistic in the Cultural Landscape Management Area. Farm Environment Plans are not required or desirable for extensive dryland farms on light/free draining soil.

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
52292	Beef +Lamb New Zealand	Entire submission	Entire submission		Support in part	<p>The Federation supports in part the entire submission of Beef + Lamb New Zealand because it shares the aspiration of a more sustainable and equitable approach for all farmers. Despite its support, the Federation recognises that undesirable economic and social consequences are likely if the Plan does not sufficiently recognise current use. The relief sought by this and other submitters clearly shows a need for a substantial amount of additional work before a finalised management framework can be put in place for a further reduction in nitrogen loss below what can be generally expected as part of good management practice.</p> <p>Matters of particular significance or interest are identified in our further submissions on other parts of the submission of Beef + Lamb New Zealand.</p>
52292	Beef +Lamb New Zealand	<a href="#">V1pLWRP-568</a>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan	Amend Variation to include an objective to give statutory weight to the vision for the catchment "restore the mauri of Te Waihora, while maintaining the prosperous land-based economy and thriving communities".	Support in part	A suitable objective will guide the development and implementation of the sub-regional management framework for the Selwyn/Waihora Catchment. Catchment-focused policies and rules are potentially out of scope without an objective. Finally there are few if any disadvantages in including an objective.
52292	Beef +Lamb New Zealand	<a href="#">V1pLWRP-570</a>	Proposed Variation 1 to the Proposed Canterbury Land and Water	The submitter requests the inclusion of an objective to give statutory weight to the vision for the catchment "restore the mauri of Te Waihora while maintaining the prosperous land-based economy and thriving communities".	Support in part	A suitable objective will guide the development and implementation of the sub-regional management framework for the Selwyn/Waihora Catchment. Catchment-focused policies and rules are potentially out of scope without an objective. Finally there are few if any disadvantages in including an objective.



Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
			Regional Plan			
52292	Beef +Lamb New Zealand	<a href="#">V1pLWRP-572</a>	11.1a	<p>Amend definition of 'Nitrogen Baseline' to read:</p> <p>(a) The mean maximum discharge of nitrogen below the root zone in any one year , as modelled with OVERSEER<sup>®</sup> , or equivalent model approved by the Chief Executive of Environment Canterbury, over the period of 01 July 2009 - 30 June 2013, and expressed in kg per hectare per annum, except in relation to Rules 5.46 and 5.62, where it is expressed as a total kg per annum from the identified area of land; and</p> <p>(b) in the case where a building consent or an effluent discharge consent have been granted for a new or upgraded dairy milking shed, or a new or upgraded irrigation system has been commissioned or a building consent granted for a new or upgraded facility associated with the farming operation or significant change in intensity of operation implemented in the period 01 July 2009 - 30 June 2013, the calculation under (a) will be on the basis that the dairy farming activity is operational; and (c) if OVERSEER<sup>®</sup> is updated, the most recent version is to be used to recalculate the nitrogen baseline using the same input data for the period 01 July 2009 - 30 June 2013.</p> <p>[A decision is yet to be made by the Hearing Commissioners on whether this is a valid submission point.]</p>	Support in part	Base-lining as an average does not allow for variations in enterprise, stock type, or cropping regimes, impact of drought, or irrigation development or pasture renewal that are likely on any farm other than 'an established dairy farm' over a time period as significant as the baseline period, nor does it fairly reflect what is taking place on the land. In other words a base-lining approach without recognition of changes over time will enforce farming to the least intensive farming activity over the baseline period. While such an approach may not result in significant disruption for an established dairy farm, consequences could be very significant for other (often relatively less intensive) farm types which require flexibility as a normal part of their business.
52292	Beef +Lamb New Zealand	<a href="#">V1pLWRP-573</a>	11.4.14	Amend policy 11.4.14 (b)(iv) to 5% for irrigated sheep, beef, deer and 11.4.14 (b) (v) to 2% for dryland sheep, beef and deer.	Support in part/Oppose in	<p><u>Support</u> because economic impacts of staged reductions on identified farm types are not well understood.</p> <p><u>Oppose</u> because EBIT is not an appropriate tool to</p>

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
					part	determine appropriate nitrogen reductions at least not without due consideration of other factors. In any case we will have little idea of what is appropriate until Good Management Practice Nitrogen and Phosphorus Loss Rates exist. A further Variation or Plan Change will be required to incorporate this information.
52292	Beef +Lamb New Zealand	<a href="#">V1pLWRP-576</a>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan	Delete references to 'nitrogen discharge allowances' and replace with 'maximum permitted contaminant loss' to more accurately reflect what is being discussed and to remove any suggestion that there are 'rights' or 'entitlements' associated with the discharge of contaminants into the environment.	Support in part	Discharges of nitrogen beyond what the receiving environment can assimilate or sustain are a pollutant and it is appropriate to administer them as such.
52292	Beef +Lamb New Zealand	<a href="#">V1pLWRP-578</a>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan	No specific decision requested. Amend Variation 1, so that Farm Environmental Plans are required only where there are benefits in managing contaminant loss issues.	Support in part	The Federation agrees that Farm Environment Plans are not required in all circumstances, for example for extensive dryland farms on light/free draining soil.
52292	Beef +Lamb New Zealand	<a href="#">V1pLWRP-579</a>	11.5.7	No specific decision requested. Amend Rule 11.5.7 to provide for Farm Environment Plans to be completed in a reasonable timeframe after the results of the Matrix of Good Management project are known.	Support in part	The timeframe for staged introduction of Farm Environment Plans is not realistic in the Cultural Landscape Management Area.

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
52292	Beef +Lamb New Zealand	<a href="#">V1pLWRP-580</a>	11.1a	Amend the definition of Intensive Winter Grazing to read:  "means grazing of stock between 1 May and 30 September on fodder crops or pasture where the grazing results in removal of, or damage to vegetation and exposes large areas of bare ground and/or pugging of the soil."	Support in part	The conditions described in the definition of 'Intensive Winter Grazing' in the notified Variation will arise in virtually any stocking situation on land during the winter months. Refinement is required so that the definition actually reflects the activity that the Council seeks to control.
52292	Beef +Lamb New Zealand	<a href="#">V1pLWRP-581</a>	11.4.12	Amend policy 11.4.12 (d) to more accurately reflect the inclusion of drains discharging to surface water as the waterbodies to which the regional stock access to water rules and policies apply.	Support in part	There is no reason to exclude stock from drains that do not discharge to surface water. Surface excavations to divert stormwater runoff away from a silage stack or a farm structure and onto a paddock might be considered a drain (and controlled as such), even though discharges from them to land have little or no significant adverse effect and they prevent damage to buildings or further adverse effects (as stock piles of feed or waste are mobilised, for example).
52292	Beef +Lamb New Zealand	<a href="#">V1pLWRP-582</a>	11.5.18	Amend Rule 11.5.18 to more accurately reflect the inclusion of drains discharging to surface water as the waterbodies to which the regional stock access to water rules and policies apply.	Support in part	There is no reason to exclude stock from drains that do not discharge to surface water. Surface excavations to divert stormwater runoff away from a silage stack or a farm structure and onto a paddock might be considered a drain (and controlled as such), even though discharges from them to land have little or no significant adverse effect and they prevent damage to buildings or further adverse effects (as stock piles of feed or waste are mobilised, for example).
52292	Beef +Lamb New Zealand	<a href="#">V1pLWRP-583</a>	Proposed Variation 1 to the Proposed Canterbury Land and Water	No specific decision requested. Amend Variation 1 to better reflect the pLWRP stock access rules that permit stock access to water subject to conditions.	Support in part	The Federation supports in principle the approach of full-time stock exclusion from surface water as an aspirational goal. Notwithstanding our support it is important to be mindful that requirements to exclude stock from all surface water are unworkable in the hill and high country environment due to very high cost and very likely loss of ability to use land. For most hill and high country farming situations, the priority resource management issues are adverse effects of proliferation of

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
			Regional Plan			plant and animal pests and soil erosion, not the effects of stock access to surface water.
52242	Bowden Environmental	Entire Submission	Entire Submission		Support in part	The Federation by and large supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support are as the reasons given by the submitter, or as provided for equivalent points raised in the submission and further submissions of Federated Farmers.
52239	Central Plains Water Ltd	Entire Submission	Entire Submission		Support in part	The Federation by and large supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support are as the reasons given by the submitter, or as provided for equivalent points raised in the submission and further submissions of Federated Farmers.
51995	Committee Malvern Hills Protection Society	<a href="#">V1pLWRP-1198</a>	11.5.13	Amend Rule 11.5.13 by reducing 80kgs to 50kgs or less, and an earlier timeframe (not specified in submission).	Support in part	The Federation considers that the relief sought re-enforces concerns about the status of the Variation without Good Management Practice Nitrogen and Phosphorus Loss Rates. Until the Matrix of Good Management project is complete, we will not know if nitrogen loss to 50 kg/ha/annum is attainable for all land uses by 2037.
53683	Dairy Holdings Ltd	Entire Submission	Entire Submission		Support in part	The Federation by and large supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support are as the reasons given by the submitter, or as provided for equivalent points raised in the submission and further submissions of Federated Farmers.

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
						Matters of particular significance or interest, and that are <u>supported</u> , are identified in our further submissions on other parts of the submission of Dairy Holdings Ltd
53683	Dairy Holdings Ltd	<a href="#">V1pLWRP-1938</a>	11.4.12	Amend Policy 11.4.12 as follows: Reduce discharges of nitrogen, phosphorus, sediment and microbial contaminants from farming activities in the catchment by requiring farming activities <u>on land that is not irrigated with water from an Irrigation Scheme</u> to: (a) Not exceed the nitrogen baseline where a property's nitrogen loss calculation is more than 15 kg of nitrogen per hectare per annum unless provided for by a <u>nutrient management group established in accordance with Rule 11.5.10A</u> ; and	Support in part	The Federation considers that the concept of a 'nutrient management group' is useful and should be included in the Plan. There is potential in particular to assist farms to meet nitrogen reduction targets over time as benefits of practices exercise on one farm can be shared (and presumably funded) across multiple properties.
53683	Dairy Holdings Ltd	<a href="#">V1pLWRP-1944</a>	11.5 Rules	Amend to include a new rule under Rule 11.5.10 to read: <u>11.5.10A Notwithstanding rules 11.5.6 to 11.5.9, the use of land for a farming activity as part of a nutrient management group in the Selwyn Waihora catchment is a discretionary activity, provided the following conditions are met:</u> <u>1. the nutrient management group has a nutrient management plan that manages the allocation of nutrients between members;</u> <u>2. the properties subject to the nutrient management group are all subject to a Farm Environment Plan that has either been prepared in accordance with Schedule 7 Part A or is consistent with Schedule 7Part A; and</u> <u>3. the nitrogen loss calculation for all members of the nutrient management group does not increase above the total combined nitrogen baseline for all members.</u> <u>Note: If a member of the nutrient management group receives water from the Central Plains scheme, then compliance for Central Plains with the total scheme nitrogen limit in Table 11(j) shall be based on the</u>	Support in part	The Federation considers that the concept of a 'nutrient management group' is useful and should be included in the Plan. There is potential in particular to assist farms to meet nitrogen reduction targets over time as benefits of practices exercise on one farm can be shared (and presumably funded) across multiple properties.

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
				<u>individual nitrogen baseline of the relevant member and not its share of the total combined nitrogen baseline available by virtue of any nutrient management group.</u>		
53683	Dairy Holdings Ltd	<a href="#">V1pLWRP-1945</a>	11.5.14	<p>Submitter seeks that the plan is amended to ensure that there is a requirement for each property receiving water from Central Plains to either comply with the Central Plains water supply agreement (and the management of nutrients by Central Plains) or, in the alternative, to comply with its own nitrogen baseline.</p> <p>Amend Rule 11.5.14 as follows:  Despite any of Rules 11.5.2 to 11.5.13, the use of land for a farming activity in the Selwyn Waihora catchment is a permitted activity provided the following conditions are met:  1. The property is irrigated with water from an irrigation scheme and the discharge is a permitted activity under Regional Rule 5.61; or  2. The property is irrigated with water from an Irrigation Scheme listed in Table 11(j) and :  (a) <u>the supply of water is subject to a water supply agreement that regulates the management of nutrients and the irrigation scheme holds a discharge consent under Rule 11.5.15 = ;_____or</u>  (b) <u>the property complies with its nitrogen baseline (as might be modified by the requirements of any nutrient management group formed in accordance with Rule 11.5.10A).</u></p>	Support in part	The Federation considers that the concept of a 'nutrient management group' is useful and should be included in the Plan. There is potential in particular to assist farms to meet nitrogen reduction targets over time as benefits of practices exercise on one farm can be shared (and presumably funded) across multiple properties.
53683	Dairy Holdings Ltd	<a href="#">V1pLWRP-1946</a>	11.5 Rules	<p>Amend to include a new rule under 11.5.31 [to provide for the take of small volumes of groundwater for dairy shed supply] to read as follows:  <u>11.5.31A The taking and using of less than 5 L/s and more than 10m<sup>3</sup> but less than 100 m<sup>3</sup> per day of groundwater is a permitted activity provided the following condition is complied with:</u></p>		

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
				<p><u>1. The Property is more than 20 hectares in area; and</u></p> <p><u>2. The bore is located more than 20 m from the site boundary where that site is in different ownership or any surface water body</u></p> <p><u>Note: A take under this rule can be in addition to the take and use of groundwater or surface water on the same Property by way of resource consent or irrigation scheme supply.</u></p>		
53683	Dairy Holdings Ltd	<a href="#">V1pLWRP-1948</a>	11.5 Rules	<p>Amend to include a new rule under Rule 11.5.36 [to expressly make provision for water users groups] as follows:</p> <p><u>11.5.10A The take and use of groundwater as part of a Water Users Group in the Selwyn Waihora catchment is a discretionary activity, provided the following conditions are met:</u></p> <p><u>1. All members of the Water Users Group have a condition on their resource consent that provides for the establishment of a Water users Group and requires abstraction rates and volumes to recorded at no less than 15 minute intervals; and</u></p> <p><u>2. The total take by all members of the Water Users Group does not exceed the total combined rate and volume available to all members by virtue of the Water Users Group</u></p>	Support in part	The Federation considers that the concept of a 'nutrient management group' is useful and should be included in the Plan. There is potential in particular to assist farms to meet nitrogen reduction targets over time as benefits of practices exercise on one farm can be shared (and presumably funded) across multiple properties.
52271	Dairy NZ	Entire Submission of Dairy NZ	Entire Submission of Dairy NZ		Support in part/Oppose in part	<p>The Federation by and large supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support are as the reasons given by the submitter, or as provided for equivalent points raised in the submission and further submissions of Federated Farmers.</p> <p>Matters of particular significance or interest, and that are <u>supported</u>, are identified in our further submissions on</p>

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
						<p>other parts of the submission of Dairy NZ.</p> <p>Despite overall support for the submission and the aspiration expressed throughout for an improved outcome for the community and environment, Federated Farmers does not support all parts of the submission. Aspects of the submission and relief sought that are <u>opposed</u> and reasons for opposition are identified in further submissions on other parts of the submission of Dairy NZ.</p>
52271	Dairy NZ	<a href="#">V1pLWRP-1344</a>	11.4.1	<p>Amend Policy 11.4.1 to read:</p> <p>Manage water abstraction and discharges of contaminants within the entire Selwyn-Waihora catchment to avoid <u>significant</u> cumulative <u>adverse</u> effects on the water quality of Te Waihora/Lake Ellesmere and flow of water in springs and tributaries flowing into Te Waihora/Lake Ellesmere.</p>	Support in part	<p>The Federation supports the relief sought, but does not agree that it goes far enough. A more appropriate relief sought would be ...<i>avoid <u>any increase in significant cumulative</u> adverse effects...</i></p>
52271	Dairy NZ	<a href="#">V1pLWRP-1350</a>	11.4.13	<p>Delete Policy 11.4.13. Replace with a commitment (in a method or advisory note) to develop Good Management Practice Nitrogen Phosphorus Loss rates, for inclusion in the Plan and to require compliance with those rates from 1 January 2017.</p>	Support in part	<p>Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.</p>
52271	Dairy NZ	<a href="#">V1pLWRP-1351</a>	11.4.14	<p>Delete Policy 11.4.14 and replace with a commitment (in a method or advisory note) as follows:</p> <p><u>Following the confirmation of the good management practice nitrogen loss rates, as defined by the Matrix of Good Management project, the Council will review the catchment nitrogen load limit, and develop a strategy for the reduction of N loss to comply with that limit over time. The means to achieve the required reduction (including the reductions required from the nitrogen baseline for individual properties) will, in conjunction</u></p>	Support in part	<p>Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.</p>



Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
				<u>with the good management practice nitrogen loss rates, be introduced to the Plan by way of the First Schedule process.</u>		
52271	Dairy NZ	<a href="#">V1pLWRP-1352</a>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan	No specific decision requested. Submitter seeks the inclusion of a method to develop a mechanism that provides for the transfer of nitrogen loss rates, which enables flexibility.	Oppose in part	The Federation considers that the implications of nutrient trading, or what it will mean for the community and the environment have not been sufficiently investigated to be supported at this time. Accordingly Federated Farmers opposes in part the relief sought by the submitter.
52271	Dairy NZ	<a href="#">V1pLWRP-1353</a>	11.4.15	Delete Policy 11.4.15. or Policy 11.4.15 should be amended such that the extent and pace of reductions in nitrogen loss (from the Good Management Practice Nitrogen Phosphorus Loss rates) post 1 January 2022 is determined having regard to (in addition to the matters listed in Policy 11.4.15): the nitrogen baseline for nitrogen loss and the loss reduction history on farm; any geophysical conditions and constraints (that may not be taken into account in the Good Management Practice Nitrogen Loss rate) that restrict or limit the effectiveness of nitrogen reduction options; the extent and age of existing infrastructure on farm and the opportunity for further infrastructure investment to achieve reductions in nitrogen loss; and the capital and operating cost associated with achieving the reduction	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52271	Dairy NZ	<a href="#">V1pLWRP-1355</a>	11.4.22	Amend Policy 11.4.22 (c) as follows: In all other cases 50% of any transferred water is	Support in part	It is not necessary or appropriate to excessively restrict transfer of water permits because it is inefficient and it is a missed opportunity to 'clawback' unused or

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
				surrendered, <u>unless a lesser amount is justified in the individual circumstances of the case.</u>		unnecessary water allocations. Accordingly the Federation supports the relief sought but see that it does not go far enough.  This matter has already been addressed by the Council in its decisions on the pLWRP.
52271	Dairy NZ	<a href="#">V1pLWRP-1381</a>	Table 11(m): Limits for Groundwater	No specific decision requested. Include a method in Variation 1 committing the Council to monitor the achievability of the groundwater limits, and to adjust those limits if and when improved information and modelling capability enhances the ability to predict the effect of the provisions included in this plan (and other committed catchment interventions).	Support in part	Relief sought reflects the current state of debate and uncertainty on the setting of minimum flows and viability and timeline to commissioning of the Central Plains Water Scheme.
52271	Dairy NZ	<a href="#">V1pLWRP-1358</a>	Table 11(c): Selwyn Waihora Minimum Flows and Partial Restriction Regime for A Permits	Amend Tables 11(c) by removing the minimum flows and regime restriction flow levels that apply from 2025. Introduction of those flows once actual flow increases are confirmed and insert a new method committing to the introduction of minimum flows and flows at which restrictions will apply once increased flows are observed in the water bodies listed in Table 11(c).	Support in part	Relief sought reflects the current state of debate and uncertainty on the setting of minimum flows and viability and timeline to commissioning of the Central Plains Water Scheme.
52271	Dairy NZ	<a href="#">V1pLWRP-1369</a>	11.5.9	Amend Rule 11.5.9 as follows: Delete matters of discretion 2 and 3 and replace them with a new matter to apply, at least until such time as the Good Management Practice Nitrogen and Phosphorus Loss Rates and associated reduction strategy are introduced to the pLWRP through the first Schedule process (whereby matters of discretion might also be reviewed).  The exercise of discretion is restricted to the following	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.

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				<p>matters:</p> <p>1. The quality of, compliance with the Farm Environment Plan; and</p> <p>2. <del>The Good Management Practice Nitrogen and Phosphorus Loss Rates to be applied to the property in accordance with Policy 11.4.13(b); and</del></p> <p>3. <del>The nitrogen loss rates to be applied to the property in accordance with Policy 11.4.14 (b), Policy 11.4.15 and Policy 11.4.16; and</del></p> <p>3. <u>The nitrogen and phosphorus management practices used and the potential for, and feasibility of improving those management practices or adopting new and additional management practices</u></p> <p>4. The nitrogen load target for farming activities in Table 11(i); and...</p> <p>5. The potential benefits of the activity to the applicant, the community and the environment.</p>		
52271	Dairy NZ	<a href="#">V1pLWRP-1370</a>	11.5.10	<p>Amend Rule 11.5.10 as follows.</p> <p>The use of land for a farming activity as part of a farming enterprise in the Selwyn-Waihora catchment is a <u>restricted</u> discretionary activity, provided the following conditions are met.</p> <p>1. A Farm Environment Plan has been prepared in accordance with Schedule 7 Part A; and</p> <p>2. The nitrogen loss calculation for the farming enterprise has not increased above the nitrogen baseline.</p> <p><u>The exercise of discretion is restricted to the following matters.</u></p> <p>1. <u>The quality of compliance with the Farm Environment Plan; and</u></p> <p>2. <u>Existing nitrogen and phosphorus management practices on the property and the potential to adopt or improve management practices to reduce nutrient loss; and</u></p>	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
				<u>3. The nitrogen load target for farming activities in Table 11(i); and</u> <u>4. The potential benefits of the activity to the applicant, the community and the environment.</u>		
52271	Dairy NZ	<a href="#">V1pLWRP-1371</a>	11.5.21	Delete Rule 11.5.21 or insert a new section 4A into Schedule 7 of the pLWRP as follows: <u>4A. For farms located with the Lake Area in the Cultural Landscape/Values Management Area, particular regard must be had to assessing risks of contaminants entering to drains that discharge to Lake Ellesmere/Te Waihora.</u>	Support in part	The Federation supports the relief sought as an alternative to requiring all farmers within the Lake Area to apply for resource consent as a discretionary activity to discharge drainage water, which is inefficient.
52271	Dairy NZ	<a href="#">V1pLWRP-1516</a>	11.1a	Amend to include a definition of "Selwyn-Waihora Nitrogen Baseline" as follows:  <u>"(a) the discharge of nitrogen below the root zone, as modelled with OVERSEER<sup>®</sup> or equivalent model approved by the Chief Executive of Environment Canterbury, either i. for the period 01 July 2012- 30 June 2013; or ii. averaged over two, three or four consecutive years in the period 01 July 2009 - 30 June 2013, whichever is the greater, and expressed in kg per hectare per annum, except in relation to Rules 5.46 and 5.62, where it is expressed as a total kg per annum from the identified area of land; and</u> <u>(b) in the case where a building consent and effluent discharge consent have been granted for a new or upgraded dairy milking shed in the period 01 July 2009 - 30 June 2013, the calculation under (a) will be on the basis that the dairy farming activity is fully operational; and</u> <u>(c) if OVERSEER<sup>®</sup> is updated, the most recent version is to be used to recalculate the nitrogen baseline using the same input data as was used for the original baseline determination."</u>	Support in part	Base-lining as an average does not allow for variations in enterprise, stock type, or cropping regimes, impact of drought, or irrigation development or pasture renewal that are likely on any farm other than 'an established dairy farm' over a time period as significant as the baseline period, nor does it fairly reflect what is taking place on the land. In other words a base-lining approach without recognition of changes over time will enforce farming to the least intensive farming activity over the baseline period. While such an approach may not result in significant disruption for an established dairy farm, consequences could be very significant for other (often relatively less intensive) farm types which require flexibility as a normal part of their business.

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52271	Dairy NZ	<a href="#">V1pLWRP-1576</a>	11.5.11	<p>No specific decision requested. Submitter seeks that Rule 11.5.12 be combined with Rule 11.5.11 such that any farming activity that does not meet one or more of the conditions of restricted discretionary activity becomes a non-complying activity and not prohibited.</p> <p>As a consequence the submitter proposes the addition of a new policy limiting the granting of non-complying activities for nitrogen loss that exceeds the nitrogen baseline to exceptional cases.</p>	Support in part	Water quality and water quantity limits which underlie prohibited activity status are based on incomplete information. We do not know if the adverse effects of the subject activities are inappropriate in all circumstances, so it is not appropriate to prohibit them.
52271	Dairy NZ	<a href="#">V1pLWRP-1523</a>	11.5.12	<p>No specific decision requested. Submitter seeks that Rule 11.5.12 be combined with Rule 11.5.11 such that any farming activity that does not meet one or more of the conditions of restricted discretionary activity becomes a non-complying activity and not prohibited.</p> <p>As a consequence the submitter proposes the addition of a new policy limiting the granting of non-complying activities for nitrogen loss that exceeds the nitrogen baseline to exceptional cases.</p>	Support in part	Water quality and water quantity limits which underlie prohibited activity status are based on incomplete information. We do not know if the adverse effects of the subject activities are inappropriate in all circumstances, so it is not appropriate to prohibit them.
52271	Dairy NZ	<a href="#">V1pLWRP-1524</a>	11.4 Policies	<p>No specific decision requested. Amend to include a new policy limiting the granting of non-complying activities for nitrogen loss that exceeds the nitrogen baseline to exceptional cases.</p> <p>This is to work in conjunction with submitter's proposed amendment to combine Rules 11.5.11 and 11.5.12 such that activities that exceed the nitrogen baseline are non-complying instead of prohibited.</p>	Support in part	Water quality and water quantity limits which underlie prohibited activity status are based on incomplete information. We do not know if the adverse effects of the subject activities are inappropriate in all circumstances, so it is not appropriate to prohibit them.
52225	Director General of Conservation	<a href="#">V1pLWRP-211</a>	11.4.21	Amend Policy 11.4.21 to read as follows: Manage groundwater and surface water together as a single resource, to ensure, in combination with the introduction of alpine water into the catchment, flows in the Waikirikiri/Selwyn River and Lowland Streams are improved and the allocation limits <b>and targets</b> in Table	Oppose	Table 11(e) does not include targets.

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				11(e) are met.		
52225	Director General of Conservation	<a href="#">V1pLWRP-217</a>	11.4.28	Amend Policy 11.4.28 and associated Tables 11(c) and 11(d) so that the flow and part restriction regime in the Tables is implemented as soon as possible once Variation 1 is operative.	Oppose	<p>Flow regimes are not sustainable without the Central Plains Water Scheme. Accordingly it is not appropriate to require compliance with them 'as soon as possible'.</p> <p>The negative economic and social outcomes of the relief sought and incomplete technical basis to support such action, illustrate the problems with the amended flow and restriction regimes identified in the submission of Federated Farmers and other primary sector groups.</p>
52225	Director General of Conservation	<a href="#">V1pLWRP-218</a>	Table 11(c): Selwyn Waihora Minimum Flows and Partial Restriction Regime for A Permits	Amend Policy 11.4.28 and associated Tables 11(c) and 11(d) so that the flow and part restriction regime in the Tables is implemented as soon as possible once Variation 1 is operative.	Oppose	<p>Flow regimes are not sustainable without the Central Plains Water Scheme. Accordingly it is not appropriate to require compliance with them 'as soon as possible'.</p> <p>The negative economic and social outcomes of the relief sought and incomplete technical basis to support such action, illustrate the problems with the amended flow and restriction regimes identified in the submission of Federated Farmers and other primary sector groups.</p>
52225	Director General of Conservation	<a href="#">V1pLWRP-219</a>	Table 11(d) Selwyn Waihora Minimum Flows for B Permits	Amend Policy 11.4.28 and associated Tables 11(c) and 11(d) so that the flow and part restriction regime in the Tables is implemented as soon as possible once Variation 1 is operative.	Oppose	<p>Flow regimes are not sustainable without the Central Plains Water Scheme. Accordingly it is not appropriate to require compliance with them 'as soon as possible'.</p> <p>The negative economic and social outcomes of the relief sought and incomplete technical basis to support such action, illustrate the problems with the amended flow and restriction regimes identified in the submission of Federated Farmers and other primary sector groups.</p>
52225	Director General of Conservation	<a href="#">V1pLWRP-223</a>	11.4.31	Amend Policy 11.4.31 to read as follows: Prohibit in-stream damming of the full flow on the main stem of the Selwyn River/Waikirikiri, and the Waiāniwaniwa River	Oppose in part	The relief sought does not makes sufficient provision for damming and diversion of a minor nature as might occur with stock water systems (essential to sustain farming in

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				<u>including all tributaries</u> above its confluence with the Selwyn River/Waikirikiri.		the hill and high country), or construct bridges or culverts.
52225	Director General of Conservation	<a href="#">V1pLWRP-238</a>	11.5 Rules	Amend [Region wide] Rules 5.77 and 5.78 or provide a new Rule in Variation 1, to ensure the quality of drainage water can be managed by landowners of individual properties and to clarify where consenting requirements for the discharge fall when the drainage is from multiple properties.	Oppose	Unclear what is being asked for. It would not be appropriate to require resource consents for all discharges of land drainage water.
52225	Director General of Conservation	<a href="#">V1pLWRP-198</a>	11.4.1	Amend Policy 11.4.1 to read as follows: Manage water abstraction and discharges of contaminants within the entire Selwyn-Waihora catchment to avoid adverse cumulative effects on the water quality of Te Waihora/Lake Ellesmere, <u>streams and shallow groundwater</u> ; and flow of water in springs and tributaries flowing into Te Waihora/Lake Ellesmere.	Oppose	<p>The relief sought makes an already excessively stringent policy even more unachievable. It is practically impossible to make use of land within the Selwyn Waihora while achieving the requirements of Policy 11.4.1. – The relief sought would only make it more so.</p> <p>A further potential consequence of the relief sought is to detract from or dilute the policy, which is to protect Te Waihora/Lake Ellesmere.</p>
52225	Director General of Conservation	<a href="#">V1pLWRP-244</a>	11.5.35	Amend Rules 11.5.35 and 11.5.36 so that non-compliance with Condition 3 of Rule 11.5.32 [the minimum flow and restriction regime] is a prohibited activity under Rule 11.5.36.	Oppose	Water quality and water quantity limits which underlie prohibited activity status are based on incomplete information. We do not know if the adverse effects of the subject activities are inappropriate in all circumstances, so it is not appropriate to prohibit them.
52225	Director General of Conservation	<a href="#">V1pLWRP-245</a>	11.5.36	Amend Rules 11.5.35 and 11.5.36 so that non-compliance with Condition 3 of Rule 11.5.32 [the minimum flow and restriction regime] is a prohibited activity under Rule 11.5.36.	Oppose	Water quality and water quantity limits which underlie prohibited activity status are based on incomplete information. We do not know if the adverse effects of the subject activities are inappropriate in all circumstances, so it is not appropriate to prohibit them.
52225	Director General of Conservation	<a href="#">V1pLWRP-246</a>	11.5.42	Amend Rule 11.5.42 as follows: The damming of the full flow of water within the bed of the main stem of the Selwyn River/Waikirikiri between the mouth at or about map reference BX23:5559-5636 to BW21:9667-9703 and BX21:9752-8937, and within the bed of the Waiāniwaniwa River above the confluence with the	Oppose	The relief sought does not makes sufficient provision for damming and diversion of a minor nature as might occur with stock water systems (essential to sustain farming in the hill and high country), or construct bridges or culverts.

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				Selwyn River/Waikirikiriri <b><u>and including all tributaries.</u></b> at or about map reference BX22:2494-7347 to BW21:1130-9083 is a prohibited activity.		
52221	Dunsandel Groundwater Users Group	Entire submission	Entire submission		Support in part	The Federation by and large supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support are as given by the submitter, or as provided for equivalent points raised in the submission and further submissions of Federated Farmers.
52210	Ellesmere Irrigation Society Inc	Entire submission	Entire submission		Support in part	The Federation agrees with the submitter that the information underlying allocation limits, connectivity between groundwater and surface water, and plan provisions supported by this information are incomplete. The relief sought recognises some of these limitations.
52107	Environmental Advisor NZPork	<a href="#">V1pLWRP-1163</a>	11.4.14	Amend Policy 11.4.14 point (b) (b) Where a property's nitrogen loss calculation is greater than 15kg of nitrogen per hectare per annum, make <del>the following</del> further percentage reduction <u>s</u> in nitrogen loss rates, beyond those set out in Policy 11.4.13(b), to achieve the catchment target for farming activities in table 11(i). <u>Levels of loss reduction required will be agreed between Environment Canterbury and agricultural sectors pending completion of the Matrix of Good Management Project, and directly related to the actual contribution of each sector to the overall nitrate loading of the catchment.</u> (i) <u>30%</u> for <u>dairy</u> (ii) <u>22%</u> for <u>dairy support</u> ; or (iii) <u>20%</u> for <u>pigs</u> ; or (iv) <u>13%</u> for <u>irrigated sheep, beef or deer</u> ; or (v) <u>10%</u> for <u>dryland sheep and beef</u> ; or (vi) <u>7%</u> for <u>arable</u> ; or (vii) <u>5%</u> for <u>fruit, viticulture or vegetables</u> ; or (viii) <u>0%</u> for any other landuse.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.



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52107	Environmental Advisor NZPork	<a href="#">V1pLWRP-1154</a>	11.1a	Amend definition of 'Baseline Land Use': Means the land use, or uses, on a property between 1 July 2009 and 30 June 2013 used to determine a property's 'nitrogen baseline' as defined in section 2.10 of this plan. <u>In cases where a building consent, effluent discharge consent or other consent has been granted for a new or changed activity in the period 01 July 2009 - 30 June 2013, the definition of 'Baseline Land Use' will be on the basis that the activity is operational.</u>	Support in part	The granting of resource consents to undertake relevant activities is evidence of bona fide of past ownership, acquisition, or investment of resources for a particular purpose that should be recognised in the application of any retrospective controls.
52107	Environmental Advisor NZPork	<a href="#">V1pLWRP-1155</a>	11.1a	Amend definition of 'Good Management Practice Nitrogen and Phosphorus Loss Rates': Means nitrogen and phosphorus loss rates (in kilograms per hectare per annum) from a property (including losses below the root zone of a property) for different soils, rainfall and farm type operating at Good Management Practice <u>as defined in section 11.1A of this plan.</u>	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52107	Environmental Advisor NZPork	<a href="#">V1pLWRP-1156</a>	11.1a	Amend to include a definition of 'Good Management Practice': <u>'Good Management Practice' means industry derived standards as agreed under the Matrix of Good Management (MGM) Project, and consists of a suite of practices that are expected to be applied on farm.</u>	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52107	Environmental Advisor NZPork	<a href="#">V1pLWRP-1157</a>	11.1a	Amend the definition of 'Intensive Winter Grazing to': Means grazing of stock between 1 May and 30 September on fodder crops or pasture <del>where the grazing results in damage to vegetation and exposes bare ground and/or pugging of the soil at a stocking rate that precludes the maintenance of groundcover, as defined by industry derived Good Management Practice.</del>	Support in part	The conditions described in the definition of 'Intensive Winter Grazing' in the notified Variation will arise in virtually any stocking situation on land during the winter months. Refinement is required so that the definition actually reflects the activity that the Council seeks to control.

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52107	Environmental Advisor NZPork	<a href="#">V1pLWRP-1159</a>	11.4.12	Amend Policy 11.4.12 point (a): (a) Not exceed the nitrogen baseline where a property's nitrogen loss calculation is more than 15kg of nitrogen per hectare per annum <u>(In cases where a building consent, effluent discharge consent or other consent has been granted for a new or changed activity in the period 01 July 2009 - 30 June 2013, the definition of nitrogen baseline will be on the basis that the activity is operational).</u>	Support in part	The granting of resource consents to undertake relevant activities is evidence of bona fide of past ownership, acquisition, or investment of resources for a particular purpose that should be recognised in the application of any retrospective controls.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-643</a>	11.4.1	Amend 11.4.1 to read:  Manage water abstraction and discharges of contaminants within the entire Selwyn Waihora catchment to avoid cumulative effects on both the water quality of Te Waihora/Lake Ellesmere and <u>the flow and quality</u> of water in springs and tributaries flowing into Te Waihora/Lake Ellesmere.	Oppose	It is not practical to avoid adverse effects on a shallow confined lake of the size and physical context of Te Waihora/Lake Ellesmere.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-648</a>	11.4.6	Retain wording in 11.4.6 with the exception of not adopting the targets and limits in Table 11(i).	Oppose	Relief sought appears to result in an incoherent plan provision.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-649</a>	11.4.7	Retain wording in 11.4.7 with the exception of not adopting the targets and limits in Table 11(i).	Oppose	Relief sought appears to result in an incoherent plan provision.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-651</a>	11.4.8	Retain wording in 11.4.8 with the exception of not adopting the targets and limits in Table 11(i).	Oppose	Relief sought appears to result in an incoherent plan provision.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-703</a>	11.5.12	Retain Rule 11.5.12	Oppose	Water quality and water quantity limits which underlie prohibited activity status are based on incomplete information. We do not know if the adverse effects of the

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	Canterbury					subject activities are inappropriate in all circumstances, so it is not appropriate to prohibit them.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-707</a>	11.5.32	Amend Rule 11.5.32 condition (5) to read: 5. The proximity and actual or potential adverse environmental effects of water use on any significant indigenous biodiversity and adjacent dryland habitat; <u>and the protection of trout and salmon habitat</u> ; and.....	Support in part	Most surface water is potential or actual 'habitat' for trout and/or salmon. A more precise wording is preferred, for example <u>the protection of spawning areas of trout and salmon...</u>
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-690</a>	11.4.28	Amend the wording of this policy as follows:  Protect the ecological and cultural health of the Waikirikiri/Selwyn River and lowland streams by including the minimum flow and partial restrictions in Tables 11(c) and 11(d) on <u>existing water permits and consents</u> , and new and replacement resource consents from 2025.	Oppose in part	The Council should not fetter its discretion to undertake review of the conditions of a resource consent under section 128 of the RMA. In any case proposed change is of little little value given the ability of the Council to undertake review of resource consents under section 128.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-691</a>	11.4.29	Delete Policy 11.4.29	Oppose in part	Policy 11.4.29 is limited to situations where ' <i>significant investment in infrastructure to take water has been made.</i> '
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-692</a>	11.4.31	Amend to include wording as follows:  Prohibit in-stream damming of the full flow on the <u>entire</u> main stem of the Selwyn River/Waikirikiri, and <u>separately prohibit instream damming of the</u> Waiāniwaniwa River <u>mainstem</u> above its confluence with the Selwyn River/Waikirikiri.	Oppose	The relief sought does not makes sufficient provision for damming and diversion of a minor nature as might occur with stock water systems (essential to sustain farming in the hill and high country), or construct bridges or culverts.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-659</a>	11.4.10	Retain wording in 11.4.10 with the exception of not adopting the targets and limits in Table 11(i).	Oppose in part	Relief sought appears to result in an incoherent plan provision.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-</a>	11.4.11	Retain wording in 11.4.11 with the exception of not	Oppose	Relief sought appears to result in an incoherent plan

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	Council North Canterbury	<a href="#">660</a>		adopting the targets and limits in Table 11(i).	in part	provision.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-661</a>		Amend to include a new policy as follows:  "Ensure that land use activities and development are managed so that the life supporting capacity and ecosystem function of water is safeguarded; and where appropriate maintain or enhance freshwater values including the trout fishery, trout spawning, recreational, and amenity values; areas of significant indigenous vegetation and significant habitats of indigenous fauna; and the natural character of waterbodies".	Support in part	This Policy is effectively an objective and should be presented as such. The Federated Farmers seeks very similar relief in terms of the inclusion of an objective in the plan in its own submission.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-671</a>	Table 11(i): Catchment Target and Limits for Nitrogen Losses from Farming Activities, Community Sewerage Systems and Industrial or Trade Processes	Amend to add phosphorus target limits.	Oppose in part	Phosphorous target limits should not be required if the subject activity adheres to good practice.
52310	Fish and Game Council North	<a href="#">V1pLWRP-</a>	Table 11(j): Irrigation	Amend to add phosphorus target limits.	Oppose in part	Phosphorous target limits should not be required if the subject activity adheres to good practice. Irrigation is

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
	Canterbury	<a href="#">672</a>	Scheme Nitrogen and Phosphorus Limits			likely to lead to better pasture or crop establishment and reduced exposure to drought, thus improving control over phosphorous loss.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-673</a>	Table 11(k): Limits for Rivers	Amend to add phosphorus target limits.	Oppose in part	Phosphorous target limits should not be required if the subject activity adheres to good practice.
52310	Fish and Game Council North Canterbury	<a href="#">V1pLWRP-674</a>	11.4.21	Retain policy 11.4.21. Submitter seeks that the limits referenced in Table 11(e) need further assessment as to the appropriateness in achieving the intent of this policy.	Support in part	The Federation agrees that the allocation limits in Table 11(e) need more work.
52333	Fonterra Co-operative Group Limited	Entire submission	Entire submission		Support in part	<p>The Federation by and large supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support are as the reasons given by the submitter, or as provided for equivalent points raised in the submission and further submissions of Federated Farmers.</p> <p>Matters of particular significance or interest, and that are <u>supported</u>, are identified in our further submissions on other parts of the submission of Fonterra Co-operative Group Limited.</p> <p>Despite overall support for the submission and the aspiration expressed throughout for an improved outcome for the community and environment, Federated Farmers does not support all parts of it. Aspects of the submission and relief sought that are <u>opposed</u> and reasons for opposition are identified in further</p>

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
						submissions on other parts of the submission of Fonterra Co-operative Group Limited.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1579</a>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan	No specific decision requested. Ensure the Variation includes appropriate linkages between [freshwater] outcomes and non-regulatory methods and acknowledges the role and importance of non-regulatory methods generally.	Support in part	Non-regulatory or industry-based certification methods can be very helpful in achieving adjustments to normal expectations of environmental practice. These benefits should be recognised and provided for in the Plan.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1573</a>	11.1a	<p>Amend definition of "Selwyn Waihora Nitrogen Baseline" as follows:</p> <p><u>Means:</u></p> <p><u>(a) the discharge of nitrogen below the root zone, as modelled with OVERSEER<sup>®</sup> or equivalent model approved by the Chief Executive of Environment Canterbury, either</u></p> <p><u>i. for the period 01 July 2012- 30 June 2013; or</u></p> <p><u>ii. averaged over two, three or four consecutive years in the period 01 July 2009 - 30 June 2013, whichever is the greater, and expressed in kg per hectare per annum, except in relation to Rules 5.46 and 5.62, where it is expressed as a total kg per annum from the identified area of land; and</u></p> <p><u>(b) in the case where a building consent and effluent discharge consent have been granted for a new or upgraded dairy milking shed in the period 01 July 2009 - 30 June 2013, the calculation under (a) will be on the basis that the dairy farming activity is fully operational; and</u></p> <p><u>(c) if OVERSEER<sup>®</sup> is updated, the most recent version is to be used to recalculate the nitrogen baseline using</u></p>	Support in part	<p>The Federation supports the relief sought, but seeks the following further changes to clause b) to better recognise farm developments that have taken place during the baseline period:</p> <p><i>(b) in the case where a building consent and effluent discharge consent have been granted for a new or upgraded dairy milking shed, or a new or upgraded irrigation system has been commissioned or a building consent granted for a new or upgraded facility associated with the farming operation or significant change in intensity of operation implemented in the period 01 July 2009 - 30 June 2013, the calculation under (a) will be on the basis that the <del>dairy</del> farming activity is fully <del>operational</del> established;</i></p> <p>It is inappropriate to not provide for the reasonable needs of farmers, who have deliberately chosen to invest in non-dairy development during the baseline period, in the same way as dairy farms are provided for.</p>

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				<u>the same input data as was used for the original baseline determination.</u>		to be not provided for.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1574</a>	11.1a	<p>Define "Selwyn-Waihora Nitrogen Loss Calculation" as follows:  <u>means any one of the following calculations that has been adopted by the person responsible for the discharge from a property as the Selwyn-Waihora Nitrogen Loss Calculation for that property:</u>  a. <u>the discharge of nitrogen below the root zone modelled in accordance with the definition of "Nitrogen Loss Calculation";</u> or  b. <u>the discharge of nitrogen below the root zone for:</u>  i. <u>the most recent year;</u> or  ii. <u>the average over two, three or four consecutive years (including the most recent year).</u>  <u>expressed in kg per hectare per year, as modelled with OVERSEER<sup>®</sup> or equivalent model approved by the Chief Executive of Environment Canterbury.</u>  <u>If OVERSEER<sup>®</sup> is updated the most recent version is to be used.</u></p>	Support in part	<p>The Federation supports the relief sought, but seeks the following further changes to clause b) to better recognise farm developments that have taken place during the baseline period:</p> <p>(b) in the case where a building consent and effluent discharge consent have been granted for a new or upgraded dairy milking shed, <u>or a new or upgraded irrigation system has been commissioned or a building consent granted for a new or upgraded facility associated with the farming operation or significant change in intensity of operation implemented in the period 01 July 2009 - 30 June 2013, the calculation under (a) will be on the basis that the dairy farming activity is fully operational established;</u></p> <p>It is inappropriate to not provide for the reasonable needs of farmers, who have deliberately chosen to invest in non-dairy development during the baseline period, in the same way as dairy farms are provided for.</p>
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1575</a>	11.4.12	<p>Amend Policy 11.4.12(a) as follows:  (a) <u>Not exceed the <del>nitrogen baseline</del> Selwyn-Waihora Nitrogen Baseline where a property's <del>nitrogen loss calculation</del> Selwyn-Waihora Nitrogen Loss Calculation is more than 15 kg of nitrogen per hectare per annum;</u>  <u>and</u>  <u>Additional method</u>  In relation to the second issue raised in the adjacent column, Fonterra's considers that, as a minimum, the uncertainty surrounding the uptake of the 15kgs N/ha/yr minimum universal allocation, means that the catchment load limit should be kept under review and accounting of the modelled nitrogen loss against the</p>	Oppose in part	<p>With full uptake 15kg is only 10% of the catchment load. If farmers below the 15 kg per hectare threshold are unable to consolidate the flexibility provided by 11.4.12, they will be even more disadvantaged in terms of loss of flexibility and loss of profitable land use development options than they already have been under the notified Variation.</p> <p>In the view of Federated Farmers the portion of the 15 kilograms that is not taken up should go to the environment, not to higher nitrogen loss farmers. Any portion of the 15 kilogram threshold that has not been taken up should remain 'with' the property and be able to</p>

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				load limit (factoring in actual take up of the 15kg allowance) be made regularly available. A method to this effect should be added to the Variation.		be used for any purpose deemed suitable by the occupier, including return to the environment to continue the exercise of stewardship.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1242</a>	11.4.15	<p>Delete Policy 11.4.15 or Policy 11.4.15 should be amended such that the extent and pace of reductions in nitrogen loss (from the Good Management Practice Nitrogen and Phosphorus Loss Rates) post 1 January 2022 is determined having regard to (in addition to the matters listed in Policy 11.4.15):</p> <p>The nitrogen baseline for nitrogen loss and the loss reduction history on farm;</p> <p>Any geophysical conditions and constraints (that may not be taken into account in the Good Management Practice Nitrogen and Phosphorus Loss Rates) that restrict or limit the effectiveness of nitrogen reduction options;</p> <p>The extent and age of existing infrastructure on farm and the opportunity for further infrastructure investment to achieve reductions in nitrogen loss; and</p> <p>The capital and operating cost associated with achieving the reduction.</p>	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1243</a>	11.4.17	Delete Policy 11.4.17(b)	Support	Good Management Practice Nitrogen and Phosphorous Loss Rates do not yet exist, so it is unknown how workable these are. In any case any change of land use will be subject to a nitrogen loss allocation from the subject irrigation scheme.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1244</a>	11.4.18	Amend Policy 11.4.18 to include methods in the Variation that support development of a catchment strategy and implementation plan to, in particular, identify critical source areas for reducing phosphorus and sediment loss. Submitter states that policies 11.4.18, 11.4.19 and 11.4.20 [restoration activities] do not provide an	Oppose in part	<p>Policy 11.4.18 concerns activities within or adjacent to Te Waihora/Lake Ellesmere.</p> <p>Other plan provisions, or relief sought by submitters already provide for these matters, including Schedule 24, requirements to prepare Farm Environmental Plans, and</p>



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				indication of when or how, these activities are to be delivered and considers that the Variation could go some way further in this regard.		requirements for 'drainage management plans'.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1249</a>	11.4.19	<p>Amend Policy 11.4.19 to include methods in the Variation that support development of a catchment strategy and implementation plan to, in particular, identify critical source areas for reducing phosphorus and sediment loss.</p> <p>Submitter states that policies 11.4.18, 11.4.19 and 11.4.20 [restoration activities] do not provide an indication of when or how, these activities are to be delivered and considers that the Variation could go some way further in this regard.</p>	Oppose in part	Other plan provisions, or relief sought by submitters already provide for these matters, including Schedule 24, requirements to prepare Farm Environmental Plans, and requirements for 'drainage management plans'.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1250</a>	11.4.20	<p>Amend Policy 11.4.20 to include methods in the Variation that support development of a catchment strategy and implementation plan to, in particular, identify critical source areas for reducing phosphorus and sediment loss.</p> <p>Submitter states that policies 11.4.18, 11.4.19 and 11.4.20 [restoration activities] do not provide an indication of when or how, these activities are to be delivered and considers that the Variation could go some way further in this regard.</p>	Oppose in part	Other plan provisions, or relief sought by submitters already provide for these matters, including Schedule 24, requirements to prepare Farm Environmental Plans, and requirements for 'drainage management plans'.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1254</a>	11.4.23	<p>Amend Policy 11.4.23 as follows: Only reallocate water to existing resource consent holders at a rate and volume that reflects demonstrated use, <u>unless the resource consent holder is operating an existing industrial or trade process and demonstrates that the unused portion of the take is necessary to allow for planned future development at the industrial or trade process site</u>.</p> <p>Add an advisory note immediately after policy 11.4.23 as follows:</p>	Oppose in part	<p>'Demonstrated use' alone is not an appropriate mechanism to reallocate water without consideration of other factors.</p> <p>Specific provision for one category of land use (industrial and trade) is not appropriate because it shifts the burden on to these other land uses. Also other water users will be unfairly prejudiced as the Council is forced to take a precautionary approach in setting aside a water</p>

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				<u>Note: For the purpose of Policy 4.50(b)(i) of this Plan, policy 11.4.23 and associated rules constitutes a method and defined timeframe to phase out over-allocation. For the avoidance of doubt, that means the requirement of Policy 4.50(b)(i) for replacement takes to be no more than 90% of the previously consented take does not apply in the Selwyn- Waihora catchment and is replaced instead by Policy 11.4.23. Give the term "demonstrated use" greater clarity by explicitly stating that return periods for dry conditions are taken into account.</u>		allocation for whatever industrial and trade use might require.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1252</a>	11.4.22	Amend Policy 11.4.22 (c) as follows: In all other cases 50% of any transferred water is surrendered, <u>unless a lesser amount is justified in the individual circumstances of the case.</u>	Support in part	It is not necessary or appropriate to excessively restrict transfer of water permits because it is inefficient and it is a missed opportunity to 'clawback' unused or unnecessary water allocations. Accordingly the Federation supports the relief sought but see that it does not go far enough.  This matter has already been addressed by the Council in its decisions on the pLWRP.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1272</a>	11.5.6	Amend Rule 11.5.6 by: 1. Deleting the phrase "nitrogen baseline" in all places where it exists and replacing it's with the term "Selwyn-Waihora nitrogen baseline". 2. Deleting the phrase "nitrogen loss in all places where it exists and replacing it with the term "Selwyn-Waihora nitrogen loss calculation".	Support	Improved or more technically appropriate wording.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1215</a>	11.4.1	Amend Policy 11.4.1 to read: Manage water abstraction and discharges of contaminants within the entire Selwyn-Waihora catchment to avoid <u>significant cumulative adverse</u> effects on the water quality of Te Waihora/Lake Ellesmere and flow of water in springs and tributaries flowing into Te Waihora/Lake Ellesmere.	Oppose in part	The Federation supports the relief sought, but does not agree that it goes far enough. A more appropriate relief sought would be ... <u>avoid any increase in significant cumulative adverse effects...</u>

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52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1226</a>	11.4.11	Amend Policy 11.4.11 to read: Enable the discharge of wastewater or liquid waste from an industrial or trade process into or onto land which cumulatively will result in the exceedance of the nitrogen load limit for industrial and trade processes in Table 11(i) only in circumstances where the activity is replacing a farming activity and the nitrogen discharge per hectare per year will not exceed the greater of : 1. 15 kg nitrogen per hectare per annum; or 2. <u>the lawfully permissible nitrogen loss from the farming activity that is replaced.</u>	Oppose in part	The 'lawful permissible nitrogen loss from the farming activity that is replaced' will be subject to reductions over time. The level of control available means that with good management practice nitrogen loss to the farm system should not exceed 15 kg of nitrogen per hectare per annum in any case.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1224</a>	Table 11(i): Catchment Target and Limits for Nitrogen Losses from Farming Activities, Community Sewerage Systems and Industrial or Trade Processes	Amend Table 11(i) by adjusting the total nitrogen load allocated to Industrial or Trade Processes in Table 11(i). If the only consented discharges that were omitted from this calculation were those of Darfield (as itemised in the adjacent column) then the adjusted load should be 132.4 tonnes. However, as discussed later in this submission, Fonterra proposes that sludge wastes periodically applied to farm land as a substitute for fertiliser should be treated separately from other industrial or trade process wastes and be accounted for in farming activity rules and hence in the farming allocation of Table 11(i). Should that submission be accepted then the total allocation to industrial or trade processes in Table 11(i) ought to be 122.4 tonnes. Furthermore, Fonterra considers that the sector allocations provided in Table 11(i) should be further segregated such that allocations are recorded for all significant individual industrial or trade dischargers. On that basis, Fonterra should have its own line entry in the table of 35.5 tonnes (being 19 for nitrogen loss associated with wastewater discharge, 7.64 associated with condensate irrigated to the Gunn block and 8.84 tonnes associated with condensate irrigated to the Gray block).	Oppose in part	Federated Farmers opposes parts of the relief sought that relate to special dispensation or exclusions from Policies and Rules governing resource allocation among industry groups (water allocation and discharges of industrial and trade waste). The relief sought will have a negative outcome for other industry groups because the plan will take a precautionary approach to the resulting dearth of information on adverse effects of abstractions and discharges associated with industrial and trade activities. A more restrictive approach to resource allocation than is actually necessary to achieve sustainable management would therefore result. With regard to discharges of industrial or trade waste to land (Amendments sought Table (i), Rule 11.5.6, Rule 11.5.32, 11.4.6, 11.4.10, 11.4.11, 11.5.25, and 11.5.26) the relief sought is unlikely to benefit the submitter because this substance is (or ought to be) applied to land in a controlled way at a timing, rate, and depth that enables 'treatment' in the biologically active parts of the soil column. It is unlikely therefore that <i>modelled</i> nitrogen loss will exceed 15 kg/hectare/annum.

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52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1222</a>	11.4.10	No specific decision requested. Submitter seeks to adjust the total nitrogen load allocated to Industrial or Trade Processes by Table 11(i). If the only consented discharges that were omitted from this calculation were those of Darfield (as itemised in the adjacent column) then the adjusted load should be 132.4 tonnes. The submitter proposes that sludge wastes periodically applied to farm land as a substitute for fertiliser should be treated separately from other industrial or trade process wastes and be accounted for in farming activity rules and hence in the farming allocation of Table 11(i). Should that submission be accepted then the total allocation to industrial or trade processes in Table 11(i) ought to be 122.4 tonnes. Furthermore, the submitter considers that the sector allocations provided in Table 11(i) should be further segregated such that allocations are recorded for all significant individual industrial or trade dischargers. On that basis, Fonterra should have its own line entry in the table of 35.5 tonnes (being 19 for nitrogen loss associated with wastewater discharge, 7.64 associated with condensate irrigated to the Gunn block and 8.84 tonnes associated with condensate irrigated to the Gray block).	Oppose	<p>Federated Farmers opposes parts of the relief sought that relate to special dispensation or exclusions from Policies and Rules governing resource allocation among industry groups (water allocation and discharges if industrial and trade waste).</p> <p>The relief sought will have a negative outcome for other industry groups because it is likely to result in the plan taking a precautionary approach as those implementing it respond to the resulting 'gap' around the effects of abstractions and discharges associated with industrial and trade activities.</p> <p>In any case the relief sought is unlikely to benefit the submitter because liquid wastes are (or ought to be) applied to land in a controlled way at a timing, rate, and depth that enables 'treatment' in the biologically active parts of the soil column. It is unlikely therefore that <i>modelled</i> nitrogen loss will exceed 15 kg/hectare/annum.</p>
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1234</a>	Schedule 24 – Farm Practices	Delete item (e) [collected animal effluent] from proposed Schedule 24. Submitter has submitted on the addition of a new method or advisory note to the effect that Schedule 24 will not apply once the Good Management Practice Nitrogen and Phosphorus Loss Rates (GMPNPL) are introduced to the plan.	Oppose in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have integrity on its own.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1235</a>	11.4 Policies	Amend to include a new Policy as follows: <u>"Reduce discharges of nitrogen, phosphorus, sediment and microbial contaminants from the discharge of animal effluent and the use of land for the management of animal effluent by requiring all collection, storage and treatment systems for animal effluent installed or</u>	Oppose in part	Introduces excessive complexity to the plan. There is no surety that all collected animal effluent will be administered through industry agreements (thus arguably removing the need for it to be included in Schedule 24

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				replaced after 1 January 2014 to adhere to the DairyNZ Farm Dairy Design Standard and Code of Practice [2013]. "[T]he addition of this policy is a consequence of the submitter's proposed deletion of item (e) [collected animal effluent] from Schedule 24 [Farm Practices].		
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1236</a>	11.4.12	Amend Policy 11.4.12(d) as follows: Exclude stock from <del>drains</del> <u>farm drainage channels</u> in addition to the regional requirements to exclude stock from lakes, rivers and wetlands.	Support in part	The term 'drains' has a very wide interpretation and potentially captures ditches to divert runoff away from structures or silage storage areas and on to paddocks, or subsurface drains. The wording proposed by the submitters narrows the scope of interpretation by introducing a sense of scale 'the farm', which better reflects what the plan is trying to achieve.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1238</a>	11.4.13	Delete Policy 11.4.13. Replacement of the provision with a commitment (in a method or advisory note) to develop Good Management Practice Nitrogen and Phosphorus Loss rates for inclusion in the Plan and to require compliance with the Good Management Practice Nitrogen and Phosphorus Loss rates from 1 January 2017.	Support in part	Good Management Practice Nitrogen and Phosphorous Loss Rates do not yet exist, so it is unreasonable to require compliance with them.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1239</a>	11.4.14	Delete Policy 11.4.14 and replace the provision with a commitment (in a method or advisory note) as follows: <u>Following the confirmation of the good practice management nitrogen loss rates the Council will review the catchment nitrogen load limit, and develop a strategy for the reduction of nitrogen loss to comply with that limit over time. The means to achieve the required reduction (including the reductions required from the nitrogen baseline for individual properties) will, in conjunction with the good practice management nitrogen loss rates, be introduced to the Plan by way of the First Schedule process.</u> Or, If Environment Canterbury does retain this provision the 30% reduction in nitrogen loss from dairy farms over an eight-year period should be reconsidered with a	Support in part	Good Management Practice Nitrogen and Phosphorous Loss Rates do not yet exist, so it is unreasonable to require compliance with them.

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				more manageable reduction rate applied (after more comprehensive cost analysis).		
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1335</a>	Schedule 7 – Farm Environment Plan	<p>The submitter proposes that if within the scope of this Variation, insert a new section 4A into Schedule 7 of the pLWRP as follows: <u>4A. For farms located with the Lake Area in the Cultural Landscape/Values Management Area, particular regard must be had to assessing risks of contaminants entering to drains that discharge to Lake Ellesmere/Te Waihora.</u></p> <p>This is an alternative and consequence of the submitter's proposal to delete Rule 11.5.2 that would mean all property owners within the Lake Area would require consent to discharge drainage water which is not considered efficient or effective regulation.</p>	Support in part	The Federation agrees that it is not efficient to require all property owners within the Lake Area to apply for resource consent as a discretionary activity to discharge drainage water.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1336</a>	11.5.25	<p>Amend Rule 11.5.25 (1) to read: Within the Selwyn-Waihora catchment the discharge of any wastewater or liquid waste from an industrial or trade process, including livestock processing, excluding <del>sewerage</del> <u>sewage</u> , into or onto land, or into or onto land in circumstances where a contaminant may enter water is a discretionary activity where the following conditions are met:</p> <p>1. The discharge in <del>addition to</del> <u>combination with</u> all lawfully established existing discharges does not exceed the nitrogen load limit in Table 11(i) for industrial or trade processes; or</p> <p>2. The activity is replacing an existing farming activity and the discharge does not exceed the greater of:</p> <p>a. 15kgs nitrogen per hectare per annum; or</p> <p><u>b. the nitrogen loss limit for the property permissible under Rules 11.5.6 to 11.5.11 or any resource consent granted pursuant to any of those rules.</u></p> <p>3. The best practicable option is used for the treatment</p>	Oppose in part	<p>Federated Farmers opposes parts of the relief sought that relate to special dispensation or exclusions from Policies and Rules governing resource allocation among industry groups (water allocation and discharges if industrial and trade waste).</p> <p>The relief sought will have a negative outcome for other industry groups because it is likely to result in the plan taking a precautionary approach as those implementing it respond to the resulting 'gap' around the effects of abstractions and discharges associated with industrial and trade activities.</p> <p>In any case the relief sought is unlikely to benefit the submitter because liquid wastes are (or ought to be) applied to land in a controlled way at a timing, rate, and depth that enables 'treatment' in the biologically active parts of the soil column. It is unlikely therefore that</p>

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				and discharge. The proposed amendments to Rule 11.5.25 are intended to work in conjunction with the submitter's proposed New Rule 11.5.25A on the discharge of industrial or trade process sludge waste and additional definition of industrial or trade process sludge waste.		<i>modelled</i> nitrogen loss will exceed 15 kg/hectare/annum.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1337</a>	11.1a	Amend to include a definition of 'Industrial or Trade Process Sludge Waste' as follows: <u>Industrial or trade process sludge waste means any semi liquid to semi solid waste produced by an industrial or trade wastewater treatment process (whether mechanical or biological) and includes the waste from a dissolved air flotation (DAF) process and waste activated sludge (WAS).</u> This is to work in conjunction with the submitter's proposed new Rule 11.5.25A on the discharge of industrial or trade process sludge waste.	Oppose in part	The words 'contaminant from any industrial or trade premises' are already used (and defined) in the Act.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1338</a>	11.5 Rules	Amend to include a new rule to read: <u>Within the Selwyn-Waihora catchment the discharge of any industrial or trade process sludge waste, including sludge waste from livestock processing, excluding sewage, into or onto land, or into or onto land in circumstances where a contaminant may enter water is a controlled activity where the following conditions are met:</u> <u>1. The discharge of the industrial or trade process sludge is undertaken in association with a farming activity being used as a substitute, or part substitute, for fertiliser.</u> <u>2. The farming activity is a permitted activity under any of Rules 11.5.6-11.5.8 or has been granted a resource consent in accordance with any of Rules 11.5.9-11.5.11 or 11.5.14.</u> <u>3. The discharge of industrial or trade process sludge</u>	Oppose in part	The potential adverse effects of the discharge described are such that it is inappropriate to make the activity subject to controlled activity status (under which an application for resource consent must be granted).



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				<u>waste occurs no more than twice per annum on the same area of land.</u> <u>Matters of control</u> <u>1. The location, rate and timing of the application sludge waste to land.</u> <u>2. Any adverse effects on mahinga kai, wāhi tapu or wāhi taonga within the Cultural Landscape /Values Management Area.</u>		
52333	Fonterra Co-operative Limited	<a href="#">V1pLWRP-1339</a>	11.5.28	Delete Rule 11.5.28	Support in part	Rule 11.5.28 creates additional costs to those seeking to roof stock holding areas to gain improved control over livestock emissions by making resulting discharge of stormwater subject to resource consent.
52333	Fonterra Co-operative Limited	<a href="#">V1pLWRP-1340</a>	11.5.32	Amend Rule 11.5.32 by adding the following matter of discretion:  <u>The staging of any increase in the minimum flow having regard to matters contained in Policy 11.4.29</u>	Support in part	
52333	Fonterra Co-operative Limited	<a href="#">V1pLWRP-1341</a>	11.5.33	Amend Rule 11.5.33 as follows: <del>Despite Unless</del> Rule 11.5.32 applies the taking of groundwater within the Selwyn-Waihora catchment and including all areas within the Little Rakaia Combined Surface and Groundwater Allocation Zone is a restricted activity provided the following conditions are met.	Support in part	It is not necessary or appropriate to excessively restrict transfer of water permits because it is inefficient and it is a missed opportunity to 'clawback' unused or unnecessary water allocations. This matter has already been addressed by the Council in its decisions on the LWRP.
52333	Fonterra Co-operative Limited	<a href="#">V1pLWRP-1321</a>	11.5.21	Delete Rule 11.5.21 or insert a new section 4A into Schedule 7 of the pLWRP as follows: 4A. For farms located with the Lake Area in the Cultural Landscape/Values Management Area, particular regard must be had to assessing risks of contaminants entering to drains that discharge to Lake Ellesmere/Te Waihora .	Support in part	The Federation agrees that it is not efficient to require all property owners within the Lake Area to apply for resource consent to discharge drainage water.
52333	Fonterra Co-operative Limited	<a href="#">V1pLWRP-</a>	11.5.10	Amend Rule 11.5.10 as follows: The use of land for a farming activity as part of a	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended



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	Limited	<a href="#">1293</a>		<p>farming enterprise in the Selwyn-Waihora catchment is a <u>restricted</u> discretionary activity, provided the following conditions are met.</p> <p>1. A Farm Environment Plan has been prepared in accordance with Schedule 7 Part A; and</p> <p>2. The nitrogen loss calculation for the farming enterprise has not increased above the nitrogen baseline.</p> <p><u>The exercise of discretion is restricted to the following matters.</u></p> <p>1. <u>The quality of, compliance with the Farm Environment Plan; and</u></p> <p>2. <u>Existing nitrogen and phosphorus management practices on the property and the potential to adopt or improve management practices to reduce nutrient loss; and</u></p> <p>3. <u>The nitrogen load target for farming activities in Table 11(i); and</u></p> <p>4. <u>The potential benefits of the activity to the applicant, the community and the environment.</u></p>		to have legal integrity without them.
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1287</a>	11.5.9	<p>Amend Rule 11.5.9 as follows: Delete matters of discretion 2 and 3 and replace them with a new matter to apply, at least until such time as the Good Management Practice Nitrogen and Phosphorus Loss Rates and associated reduction strategy are introduced to the pLWRP through the first Schedule process (whereby matters of discretion might also be reviewed). The exercise of discretion is restricted to the following matters:</p> <p>1. The quality of, compliance with the Farm Environment Plan; and</p> <p>2. <del>The Good Management Practice Nitrogen and Phosphorus Loss Rates to be applied to the property in accordance with Policy 11.4.13(b); and</del></p> <p>3. <del>The nitrogen loss rates to be applied to the property</del></p>	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.

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				<p><del>in accordance with Policy 11.4.14 (b), Policy 11.4.15 and Policy 11.4.16; and</del></p> <p><u>3. The nitrogen and phosphorus management practices used and the potential for, and feasibility of improving those management practices or adopting new and additional management practices</u></p> <p>4. The nitrogen load target for farming activities in Table 11(i); and</p> <p>5. The potential benefits of the activity to the applicant, the community and the environment.</p>		
52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1285</a>	11.5.6	<p>Amend rules 11.5.6 as follows: Despite any of Rules 11.5.7 to 11.5.13, the use of land for a farming activity in the Selwyn-Waihora catchment is a permitted activity provided the following conditions are met:</p> <p><u>1. The property is used for the disposal of wastewater or liquid waste from an industrial or trade process and a resource consent has been granted for that discharge that limits nitrogen loss from that property; or</u></p> <p>2. The property is:</p> <p>a. Less than 5 hectares; and</p> <p>b. The nitrogen loss calculation for the property does not exceed 15kg per hectare per annum.</p> <p>Note that, if Environment Canterbury decides to address this issue by an alternative means (such that both the industrial or trade process discharge rules and the land use rules apply to the same land) then any nitrogen loss reduction regime imposed should not apply the farming activity reduction to land used for industrial or trade water discharge. (Note this submission point is relevant to Policy 11.4.14). Note also that Fonterra seeks ancillary amendments to Rule 11.5.25.</p>	Oppose in part	<p>Introduces excessive complexity to the plan. If resource consent has been granted, why is a permitted activity rule required?</p> <p>Federated Farmers opposes parts of the relief sought that relate to special dispensation or exclusions from Policies and Rules governing resource allocation among industry groups (water allocation and discharges if industrial and trade waste). The relief sought will have a negative outcome for other industry groups because it is likely to result in the plan taking a precautionary approach as those implementing it respond to the resulting 'gap' around the effects of abstractions and discharges associated with industrial and trade activities. In any case the relief sought is unlikely to benefit the submitter because liquid wastes are (or ought to be) applied to land in a controlled way at a timing, rate, and depth that enables 'treatment' in the biologically active parts of the soil column. It is unlikely therefore that <i>modelled</i> nitrogen loss will exceed 15 kg/hectare/annum.</p>

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52333	Fonterra Co-operative Group Limited	<a href="#">V1pLWRP-1218</a>	11.4.6	Amend Policy 11.4.6 to include a commitment in the plan to keep the nitrogen load limit under review such that the appropriate limit is reconsidered once the Good Management Practice Nitrogen and Phosphorus Loss Rates have been confirmed.	Support	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52267	Horticulture New Zealand	Entire submission	Entire submission		Support in part	<p>The Federation by and large supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support are as the reasons given by the submitter, or as provided for equivalent points raised in the submission and further submissions of Federated Farmers.</p> <p>Matters of particular significance or interest, and that are <u>supported</u>, are identified in our further submissions on other parts of the submission of Horticulture New Zealand.</p> <p>Despite overall support for the submission and the aspiration expressed throughout for an improved outcome for the community and environment, Federated Farmers does not support all parts of the submission.. Aspects of the submission and relief sought that are <u>opposed</u> and reasons for opposition are identified in further submissions on other parts of the submission of Horticulture New Zealand.</p>
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1389</a>	11.4.6	Amend Policy 11.4.6 as follows:  <del>Limit</del> <u>Reduce</u> the total nitrogen load entering Te Waihora/ Lake Ellesmere by <del>restricting</del> <u>reducing</u> the losses of nitrogen from farming activities, industrial and trade processes and community sewerage systems <del>in accordance with the target (the limit to be met over time) and limits in Table 11(i) .</del>	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.

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52267	Horticulture New Zealand	<a href="#">V1pLWRP-1391</a>	11.4 Policies	Amend to include a new policy: <u>"Targets and limits set in this variation will be reviewed before 2017 to ensure that the refinements in methodology and models used are reflected in the allocation and targets and limits set."</u>	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1392</a>	11.4.12	Amend Policy 11.4.12 by replacing 'Reduce' with ' <u>Manage</u> '.	Support in part	High environmental performers may not need to reduce discharges of contaminants to achieve the requirements of the policy – it would be inappropriate to penalise those who have exercise stewardship efforts etc to achieve a sustainable farming system by requiring 'reduction' of all contaminants in all circumstances.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1393</a>	11.4.12	Amend Policy 11.4.12 by adding after 'property': ' <u>or farming enterprise</u> '.	Support in part	Recognises the fragmented nature of some farm enterprises.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1399</a>	11.4 Policies	Amend to include a new policy: <u>"The nitrogen baseline for a property or enterprise can be re-assessed where it can be demonstrated that the 4 years 2009-2013 do not accurately reflect the nature of the operation."</u>	Support in part	Nitrogen losses from mixed farm systems (which is most farm types other than irrigated dairy) are not fully understood. Base-lining as an average does not allow for variations in enterprise, stock type, or cropping regimes, impact of drought, or irrigation development or pasture renewal that are likely on any farm other than 'an established dairy farm' over a time period as significant as the baseline period, nor does it fairly reflect what is taking place on the land. In other words a base-lining approach without recognition of changes over time will enforce farming to the least intensive farming activity over the baseline period. While such an approach may not result in significant disruption for an established dairy farm, consequences could be very significant for other (often relatively less intensive) farm types which require flexibility as a normal part of their business.

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52267	Horticulture New Zealand	<a href="#">V1pLWRP-1403</a>	11.4.14	Delete Policy 11.4.14., or amend the policy to take into account revised assessments that are developed through the process to better reflect the impact on jobs and economic development opportunities.	Support in part	The Federation considers that reliance on EBIT to set appropriate reductions is a flawed and overly simplistic approach, particularly for farm types besides dairy which are very diverse, are often 'mixed' in nature, and will vary widely in the level of sacrifice required to achieve reductions. A more nuanced and flexible approach is needed.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1405</a>	11.4 Policies	No specific decision requested. Add a new policy and commensurate permitted activity rules and methods to enable transfer of nitrogen within and between enterprises and farms within the same water management unit, or similar rules and methods to give effect to development of a transfer system.	Oppose in part	The Federation considers that the implications of nutrient trading, or what it will mean for the community and the environment have not been sufficiently investigated to be supported at this time. Accordingly Federated Farmers opposes in part the relief sought by the submitter.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1407</a>	11.4.26	Amend Policy 11.4.26 to a reliability factor of 9 years out of 10.	Support in part	Research on reliability of supply suggests the more reliable a supply of water the more prudent farmers are in application – focussing on 'just-in-time' irrigation rather than 'just-in-case.' The pLWRP sets a reliability of supply for reasonable use at 9 years out of 10 (Schedule 10).
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1409</a>	11.4.30	Delete 11.4.30 (b).	Support in part	Clause (b) is irrelevant if clause (a) is satisfied.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1410</a>	11.5.7	Amend Rule 11.5.7 by adding after the word 'property': 'or farming enterprise'.	Support in part	Recognises the fragmented nature of some farm enterprises.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1411</a>	11.5.8	Amend Rule 11.5.8 by adding after the word 'property': 'or farming enterprise'.	Support in part	Recognises the fragmented nature of some farm enterprises.

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	Zealand	<a href="#">1411</a>				
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1412</a>	11.5.9	Amend Rule 11.5.9 by adding after the word 'property': 'or farming enterprise', and delete Matters of discretion 2 and 3.	Support in part	Recognises the fragmented nature of some farm enterprises.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1414</a>	11.5.12	Delete Rule 11.5.12 and combine with Rule 11.5.11	Support in part	Water quality and water quantity limits which underlie prohibited activity status are based on incomplete information. We do not know if the adverse effects of the subject activities are inappropriate in all circumstances, so it is not appropriate to prohibit them.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1417</a>	11.5.37	Delete Rule 11.5.37(4)	Support in part	It is not necessary or appropriate to excessively restrict transfer of water permits because it is inefficient and it is a missed opportunity to 'clawback' unused or unnecessary water allocations. This matter has already been addressed by the Council in its decisions on the pLWRP.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1419</a>	Schedule 7 – Farm Environment Plan	Delete Schedule 7 bullet point 2 'Achieve the Good Management Practice Nitrogen and Phosphorus Loss Rates from 2017', and delete Schedule 7 bullet point 3: Further reduce nitrogen loss rates from 2022 where a property's nitrogen loss calculation is greater than 15 kg of nitrogen per hectare per annum.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1544</a>	11.1a	Amend to ensure that the nitrogen baseline is based on the highest year between 2009-2013, not the rolling average.  [A decision is yet to be made by the Hearing Commissioners on whether this is a valid submission point.]	Support	Base-lining as an average does not allow for variations in enterprise, stock type, or cropping regimes, impact of drought, or irrigation development or pasture renewal that are likely on any farm other than 'an established dairy farm' over a time period as significant as the baseline period, nor does it fairly reflect what is taking place on the land. In other words a base-lining approach without recognition of changes over time will enforce farming to the least intensive farming activity over the baseline period. While such an approach may not result in significant disruption for an established dairy farm,

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						consequences could be very significant for other (often relatively less intensive) farm types which require flexibility as a normal part of their business.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1545</a>	11.4.13	<p>Amend Policy 11.4.13 as follows:</p> <p><del>From 1 January 2017, further reduce discharges of nitrogen, phosphorus, sediment and microbial contaminants from farming activities in the catchment by requiring farming activities to: (a) Implement a Farm Environment Plan prepared in accordance with Schedule 7 Part A, where a property is greater than 50 hectares; and(b) Where a property's nitrogen loss calculation is greater than 15 kg of nitrogen per hectare per annum, meet the Good Management Practice Nitrogen and Phosphorus Loss Rates for the property's baseline land use require farming activities where a property is greater than 50 hectares to implement a Farm Environment Plan, prepared in accordance with Schedule 7 Part A.</del></p>	Support	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1551</a>	11.4.15	<p>Amend Policy 11.4.15 as follows:</p> <p><del>11.4.15 In circumstances where the reductions required in Policy 11.4.14(b) are unable to be achieved by 2022,any extension of time to achieve the reductions will be considered having regard to:</del> Where a property or farming enterprise cannot achieve the nitrogen baseline an extension of time to achieve the nitrogen baseline will be considered having regard to:</p> <p>a) The implications on achieving the catchment nitrogen load target in Table 11(i) by 2037; and b) The nature of any proposed steps to achieve the reduction;</p> <p>c) The nature of the operation and the accuracy of the</p>	Support	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.

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				<p>nitrogen baseline figure for the operation or property.</p> <p>d) The nature of the operation and limitations in achieving the nitrogen baseline.</p> <p>e) Change of land use from the 'baseline land use'.</p> <p>f) The costs association with achieving the nitrogen baseline.</p> <p><del>and (c) The sequencing, measurability and enforceability of any steps proposed.</del></p>		
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1571</a>	Table 11(i):	No specific decision requested. Submitter seeks equal allocation across the catchment reflecting a differing ratio (a 2:1 ratio) across 2 slope classes (>15degrees, less than 15 degrees).	Support in part	The Federation considers that the relief sought is relevant, but that insufficient information exists to support it as an option in the Selwyn-Waihora catchment until the Matrix of Good Management project is complete.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1572</a>	Table 11(j): Irrigation Scheme Nitrogen and Phosphorus Limits	No specific decision requested. Submitter seeks equal allocation across the catchment reflecting a differing ratio (a 2:1 ratio) across 2 slope classes (>15degrees, less than 15 degrees).	Support in part	The Federation considers that the relief sought is relevant, but that insufficient information exists to support it as an option in the Selwyn-Waihora catchment until the Matrix of Good Management project is complete.
52267	Horticulture New Zealand	<a href="#">V1pLWRP-1531</a>	Schedule 10 - Reasonable Use Test	Delete changes to schedule 10 or Replace "eight and a half years" with nine years.	Support in part	Research to date on reliability of supply suggests the more reliable a supply of water the more prudent farmers are in application – focussing on 'just-in-time' irrigation rather than 'just-in-case.' The pLWRP sets a reliability of supply for reasonable use at 9 years out of 10 (Schedule 10).



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52267	Horticulture New Zealand	<a href="#">V1pLWRP-1533</a>	11.1a	Amend to include a definition of 'Irrigation Scheme' as follows: "A collective of farming enterprises collaborating to make use of a common water resource."	Support in part	Improved or more technically appropriate wording.
52278	Irrigation New Zealand Inc	Entire submission	Entire submission	All relief sought by the submitter	Support in part	The Federation supports the relief sought by Irrigation New Zealand Inc, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support are as expressed by the submitter, or as expressed for equivalent points in other parts of our other further submissions.  Matters of particular significance or interest, and that are <u>supported</u> , are identified in our further submissions on other parts of the submission of Irrigation New Zealand Inc
52278	Irrigation New Zealand Inc	<a href="#">V1pLWRP-1076</a>	11.5.9	Delete restrictions of discretion 2, 3 and 4 of Rule 11.5.9 as it is not possible for farmers to achieve the good management practice nitrogen discharge levels and subsequent reductions as they have not yet been defined.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52278	Irrigation New Zealand Inc	<a href="#">V1pLWRP-1089</a>	11.5.7	Amend condition 2 to rule 11.5.7 by referring to a new definition of 'nitrogen baseline' that is included in the Selwyn-Waihora sub-regional chapter that contains the following changes to the regional definition of 'nitrogen baseline': "the maximum discharge of nitrogen ..... approved by the Chief Executive of Environment Canterbury, <del>averaged</del> over the period of 01 July 2009-30 June 2013,...."	Support in part	Base-lining as an average does not allow for variations in enterprise, stock type, or cropping regimes, impact of drought, or irrigation development or pasture renewal that are likely on any farm other than 'an established dairy farm' over a time period as significant as the baseline period, nor does it fairly reflect what is taking place on the land. In other words a base-lining approach without recognition of changes over time will enforce farming to the least intensive farming activity over the baseline period. While such an approach may not result in significant disruption for an established dairy farm,

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						consequences could be very significant for other (often relatively less intensive) farm types which require flexibility as a normal part of their business.
52278	Irrigation New Zealand Inc	<a href="#">V1pLWRP-1091</a>	11.5.9	Amend condition 3 to rule 11.5.9 by referring to a new definition of 'Nitrogen Baseline' that is included in the Selwyn-Waihora sub-regional chapter that contains the following changes to the regional definition of 'nitrogen baseline': "the maximum discharge of nitrogen ..... approved by the Chief Executive of Environment Canterbury, <del>averaged</del> over the period of 01 July 2009-30 June 2013,...."	Support in part	Base-lining as an average does not allow for variations in enterprise, stock type, or cropping regimes, impact of drought, or irrigation development or pasture renewal that are likely on any farm other than 'an established dairy farm' over a time period as significant as the baseline period, nor does it fairly reflect what is taking place on the land. In other words a base-lining approach without recognition of changes over time will enforce farming to the least intensive farming activity over the baseline period. While such an approach may not result in significant disruption for an established dairy farm, consequences could be very significant for other (often relatively less intensive) farm types which require flexibility as a normal part of their business.
52278	Irrigation New Zealand Inc	<a href="#">V1pLWRP-1055</a>	11.4.12	Amend Policy 11.4.12(a) by referring to a new definition of 'Nitrogen Baseline' that is included in the Selwyn-Waihora sub-regional chapter that contains the following changes to the regional definition of 'Nitrogen Baseline': "the maximum discharge of nitrogen ..... approved by the Chief Executive of Environment Canterbury, <del>averaged</del> over the period of 01 July 2009-30 June 2013,...."	Support in part	Base-lining as an average does not allow for variations in enterprise, stock type, or cropping regimes, impact of drought, or irrigation development or pasture renewal that are likely on any farm other than 'an established dairy farm' over a time period as significant as the baseline period, nor does it fairly reflect what is taking place on the land. In other words a base-lining approach without recognition of changes over time will enforce farming to the least intensive farming activity over the baseline period. While such an approach may not result in significant disruption for an established dairy farm, consequences could be very significant for other (often relatively less intensive) farm types which require

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						flexibility as a normal part of their business.
52278	Irrigation New Zealand Inc	<a href="#">V1pLWRP-1056</a>	11.1a	Amend to include a definition of 'Nitrogen Baseline' that is included in the Selwyn-Waihora sub-regional chapter that contains the following changes to the regional definition of 'Nitrogen Baseline': "the maximum discharge of nitrogen ..... approved by the Chief Executive of Environment Canterbury, averaged over the period of 01 July 2009-30 June 2013,...."	Support in part	Base-lining as an average does not allow for variations in enterprise, stock type, or cropping regimes, impact of drought, or irrigation development or pasture renewal that are likely on any farm other than 'an established dairy farm' over a time period as significant as the baseline period, nor does it fairly reflect what is taking place on the land. In other words a base-lining approach without recognition of changes over time will enforce farming to the least intensive farming activity over the baseline period. While such an approach may not result in significant disruption for an established dairy farm, consequences could be very significant for other (often relatively less intensive) farm types which require flexibility as a normal part of their business.
52278	Irrigation New Zealand Inc	<a href="#">V1pLWRP-1057</a>	11.4.13	Delete clause (b) of Policy 11.4.13 as it is not possible for farmers to achieve the good management practice nitrogen discharge levels as they have not yet been defined.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52278	Irrigation New Zealand Inc	<a href="#">V1pLWRP-1059</a>	11.4.14	Delete clause (b) of Policy 11.4.14 as it is not possible for farmers to achieve the Good Management Practice Nitrogen Discharge Levels and subsequent reductions, as they have not yet been defined.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52278	Irrigation New Zealand Inc	<a href="#">V1pLWRP-1060</a>	11.4.17	Delete clause (b) of Policy 11.4.17, as it is not possible for farmers to achieve the Good Management Practice Nitrogen Discharge Levels and subsequent reductions as they have not yet been defined.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52329	Lake Ellesmere Dairy Farmers	<a href="#">V1pLWRP-</a>	11.5.21	Delete Rule 11.5.21. This would require all farms in the area to obtain resource consent for their drains. These	Support in part	The Federation endorses the concerns of the submitter regarding the ability to control runoff from nearby land.

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	Group	<a href="#">1045</a>		drains contain water from catchment areas upstream which don't belong to the consent holders and are outside of their control. There are an excessively large number of drains that would be covered by this rule.		
52329	Lake Ellesmere Dairy Farmers Group	<a href="#">V1pLWRP-1046</a>	Schedule 7 – Farm Environment Plan	No specific decision requested. Submitter seeks drain management within the Cultural Landscape/Values Management Area part of the Farm Environment Plan.	Support in part	It is appropriate for drain management to be specifically addressed through a Farm Environment Plan.
52329	Lake Ellesmere Dairy Farmers Group	<a href="#">V1pLWRP-1047</a>	11.5.28	Delete Rule 11.5.28. This would require any discharge of stormwater within the Cultural Landscape/Values Management Area that is not into a reticulated system to have resource consent. This is onerous and unnecessary and would capture water off a house roof, and dairy shed roof, calf sheds etc.	Support in part	Requirements to address stormwater runoff from roofs through a resource consent may hinder land users in exercising the very environmentally beneficial activity of roofing stock holding areas, which both prevents hydraulic conductivity of contaminants and results in accumulated animal waste that is in a more concentrated and in a form that is easier to store and apply to land in a controlled manner.
52329	Lake Ellesmere Dairy Farmers Group	<a href="#">V1pLWRP-1048</a>	11.5.18	No specific decision requested. Submitter seeks to have definition of 'drain' clarified e.g. if there is no water in it, it shouldn't need to be fenced permanently. The submitter suggests that a drain is defined consistently with the Sustainable Dairying Water Accord i.e. permanently flowing and wider than 1m.	Support in part	Improved precision around the meaning of the word 'drain' would improve the plan.
52329	Lake Ellesmere Dairy Farmers Group	<a href="#">V1pLWRP-1049</a>	11.1a	Amend to include a definition of 'drain'. The Submitter seeks clarification of a 'drain'. The submitter suggests that a drain is defined consistently with the Sustainable Dairying Water Accord i.e. permanently flowing and wider than 1m.	Support in part	Improved precision around the meaning of the word 'drain' would improve the plan.
52329	Lake Ellesmere Dairy Farmers Group	<a href="#">V1pLWRP-1051</a>	11.4.14	Delete Policy 11.4.14 and review when the Good Management Practice Nitrogen Loss numbers are determined.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.

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52266	Medical Officer of Health, Canterbury District Health Board	<a href="#">V1pLWRP-1245</a>	Table 11(a): Freshwater Outcomes for Selwyn Waihora Catchment Rivers	Amend Table 11(a) to include under Periphyton indicators values for cyanobacteria mat cover (%); include values for cyanobacteria mat cover (%) at values which are equivalent of or better quality than in the pLWRP. Lower values should be set for rivers that are utilised for sources of human drinking water or are important recreational sites.	Oppose in part	Suitable standards already exist in the pLWRP.
52266	Medical Officer of Health, Canterbury District Health Board	<a href="#">V1pLWRP-1246</a>	Table 11(m): Limits for Groundwater r	Amend Table 11(m) to include a longer term target of 5.6mg/L nitrate nitrogen annual average concentration in line with the drinking water target for 2040 in relation to ground water wells in Canterbury under the Canterbury Water Management Strategy.	Oppose in part	A long term target for <u>all</u> groundwater wells used for drinking water is unnecessarily restrictive.
52266	Medical Officer of Health, Canterbury District Health Board	<a href="#">V1pLWRP-1247</a>	Table 11(m): Limits for Groundwater r	Retain < 1 organism/100 ml E coli for ground water in Table 11(m)	Oppose in part	pLWRP Schedule 8 includes the limit for groundwater of <1 <i>E coli per 100 ml in any one sample</i> . This effectively means that the limit is no E coli, which is far lower than is necessary to achieve a safe drinking water standard and does not sufficiently provide for discharges to land that may result in the discharge of bacteria to groundwater.
52266	Medical Officer of Health, Canterbury District Health Board	<a href="#">V1pLWRP-1240</a>	Table 11(a): Freshwater Outcomes for Selwyn Waihora Catchment Rivers	Amend Table 11(a) and replace statement "no set value" in Table 11(a) under microbiological indicator with "good/fair" or "improvement on current status".	Oppose in part	There is insufficient information to support the relief sought.
52266	Medical Officer of Health, Canterbury District Health Board	<a href="#">V1pLWRP-1240</a>	Table 11(b):	Amend Table 11(b) and replace statement " <i>no set value</i> " in Table 11(a) under microbiological indicator	Oppose in part	There is insufficient information to support the relief sought.

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	Health, Canterbury District Health Board	<a href="#">1241</a>	Freshwater Outcomes for Selwyn Waihora Catchment Lakes	with "good/fair" or "improvement on current status".		
52266	Medical Officer of Health, Canterbury District Health Board	<a href="#">V1pLWRP-1232</a>	11.5.8	Retain the nitrogen loss calculation ("not exceeding 15 kg per hectare per annum"), therefore requiring resource consent (from 2017) for the use of land not meeting this criteria.	Oppose in part	There is insufficient information to support the relief sought.
52266	Medical Officer of Health, Canterbury District Health Board	<a href="#">V1pLWRP-1233</a>	11.5.9	Retain the nitrogen loss calculation ("not exceeding 15 kg per hectare per annum"), therefore requiring resource consent (from 2017) for the use of land not meeting this criteria.	Support in part	The Federation agrees with the submitter that is not necessary to require resource consents for all farmers.
52278	Mr Andrew Curtis	Entire submission	Entire submission	Amend to include a new definition for 'Farming Enterprise' in the Selwyn-Waihora sub-regional chapter for use in the amended clause (a) in policy 11.4.22, so that the definition of 'Farming Enterprise' covers multiple discrete parcels of land not just contiguous parcels.	Support in part	The Federation supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support are as expressed by the submitter, or as expressed for equivalent points in other parts of our other further submissions.
52268	Mr Archibold McArthur	<a href="#">V1pLWRP-1105</a>	Stock Exclusion	Amend stock exclusion rules in section 11 so condition 5.68(a) reads as follows:  " <u>conspicuous</u> pugging or de-vegetation that exposes <u>clearly visible</u> bare earth in the bed of a lake or river" Amend stock exclusion rules in section 11 so condition	Support in part	The Federation supports in principle the approach of full-time stock exclusion from surface water as an aspirational goal. Notwithstanding our support it is well understood within Federated Farmers, both on the basis of staff expertise, and ongoing feedback farmers that it is

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				5.68(c) is deleted.		<p>virtually impossible to farm in the hill and high country without causing <i>some</i> pugging or de-vegetation in riparian areas (however minor).</p> <p>A recent survey of Canterbury members involved in hill and high country pastoral farming made the following findings</p> <ul style="list-style-type: none"> <li>• Estimates of length of fencing required to achieve full time stock exclusion vary widely with several high country properties requiring hundreds of kilometers of fencing.</li> <li>• 60% have waterways that are valued for fishing (with potential to lose access if they are fenced).</li> <li>• 50% farm within an area of high or outstanding landscape value (with potential impacts if land reverts to scrub and weeds, or is criss-crossed with fences).</li> <li>• 60% have significant reaches of waterway which will be difficult to fence because of periodic flooding.</li> <li>• In addition to problems with fencing, hard hill and high country properties will not be able to supply stock water and comply with rule 5.68.</li> <li>• Unintended consequences of the framework will include re-infestation of very large areas with woody weeds and intensification of those areas that are able to remain in grazing.</li> </ul> <p>Rule 6.68 is particularly imbalanced in the high country where properties are very extensive with low stocking rates, and cost of construction and maintenance of fences and stock water supply systems very high relative to the minimal environmental benefit achieved. Occupants of leasehold land in the high country must</p>

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						<p>also make an application to the Commissioner of Crown lands before they can undertake any significant ground disturbance which will include</p> <p>The time available to achieve the requirements of Rule 5.68 (6 months after the plan becomes operative) is also unachievable.</p> <p>Finally in high country farms within the 'Lake Zone', a Farm Environmental Plan, along with stock exclusion as assessed to be appropriate to the property is immediately required to continue to farm anyway.</p> <p>For all of these reasons the Federation endorses and supports any opportunity to address the problems posed by pLWRP Rule 5.68 at the sub-regional plan level.</p>
52237	Mr Ian Upston	Entire submission	Entire submission	No specific decision requested. Generally seeks no additional compliance costs for farms that are not causing significant effects on water quality.	Support in part	<p>The Federation is aware that there are a number of older, more traditional farmers, almost all of whom are farming at the lower end of the scale in terms of nitrogen emission intensity, who are likely to choose early retirement from farming rather than deal with additional compliance requirements associated with Variation 1.</p> <p>Lack of recognition of the effect of increased 'paperwork' on more established farms at the lower end of the scale of emissions is likely to result in more of these farms coming on the market and in turn being purchased by people who will seek to develop them.</p> <p>The Federation sees this submission as demonstrating why there is no practical benefit of requiring keeping of nutrient budgets and farms environmental plans of all farms, no matter how insignificant in the context of what</p>



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						actually has to occur to address problems with Selwyn/ Waihora.
52127	Mr Rowan McMath	Entire submission	Entire submission	Amend 'nitrogen baseline' in rules by determining an acceptable nitrate leaching amount which all farms can work towards but not exceed, allowing some farms to decrease and others the ability to increase and removing land value distortion by allowing high and low leaching farms in 09 - 13 to be on an equal playing field.	Support in part	The submission is supported because it is consistent with the preferred policy position of the North Canterbury Province of Federated Farmers on management of diffuse discharges from farms. The submission also demonstrates that further work needs to be done once Matrix of Good Management information is available on to support an appropriate nitrogen management regime for the catchment; both to ensure future agricultural growth and productivity and move towards a more sustainable the nitrogen loss footprint for all land use activities.
52127	Mr Rowan McMath	<a href="#">V1pLWRP-36</a>	11.4.12	No specific decision requested. Amend 'Nitrogen Baseline' in policy 11.4.12 by determining an acceptable nitrate leaching amount which all farms can work towards but not exceed, allowing some farms to decrease and others the ability to increase and removing land value distortion by allowing high and low leaching farms in 09 - 13 to be on an equal playing field.		The submission is supported because it is consistent with the preferred policy position of the North Canterbury Province of Federated Farmers on management of diffuse discharges from farms. The submission also demonstrates that further work needs to be done once Matrix of Good Management information is available to support an appropriate nitrogen management regime for the catchment; both to ensure future agricultural growth and productivity and move towards a more sustainable the nitrogen loss footprint for all land use activities.
52236	Mr Tom Ferguson	Entire submission	Entire submission		Support	The Federation supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support are as expressed by the submitter, or as expressed for equivalent points in other parts of our other further submissions. Matters of particular significance or interest are identified in other parts of our further submissions.
52312	Mrs Jane Demeter	<a href="#">V1pLWRP-1021</a>	Schedule 7 – Farm	Submitter seeks less reliance on farm plans and good management practice to effect the needed change in land use practice.	Oppose in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist, therefore any plan that does not make extensive use of farm plans and good

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			Environment Plan			management practice will not have legal integrity.
52312	Mrs Jane Demeter	<a href="#">V1pLWRP-1022</a>	Schedule 24 – Farm Practices	No specific decision requested. Submitter seeks less reliance on farm plans and good management practice to effect the needed change in land use practice.	Oppose in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist, therefore any plan that does not make extensive use of farm plans and good management practice will not have legal integrity.
52312	Mrs Jane Demeter	<a href="#">V1pLWRP-1014</a>	11.4.15	No specific decision requested. Submitter seeks shorter timeframes for achieving the nutrient loads and water quality limits to limit the risk of not meeting NPS Freshwater Management requirements and Canterbury Water Management Strategy targets (timeframes are not specified).	Support in part	The catchment target and limit for nitrogen loss may well be able to be attained earlier than is required by the Variation, however the fact remains that we will have little idea of our ability to reach this target (how much change will be required or what it might cost) prior to completion of the Matrix of Good Management project.
52312	Mrs Jane Demeter	<a href="#">V1pLWRP-1015</a>	(New Heading) 11.7 Environmental Flow and Allocation Regime and Water Quality Targets/Limits	Submitter seeks shorter timeframes for achieving the nutrient loads and water quality and quantity limits to limit the risk of not meeting NPS Freshwater Management requirements and Canterbury Water Management Strategy targets (timeframes not specified).	Support in part	The catchment target and limit for nitrogen loss may well be able to be attained earlier than is required by the Variation, however the fact remains that we will have little idea of our ability to reach this target (how much change will be required or what it might cost) prior to completion of the Matrix of Good Management project.
52312	Mrs Jane Demeter	<a href="#">V1pLWRP-1017</a>	11.4.12	No specific decision requested. Submitter seeks less reliance on farm plans and good management practice to effect the needed change in land use practice.	Oppose in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist, therefore any plan that does not make extensive use of farm plans and good management practice will not have legal integrity.
52312	Mrs Jane Demeter	<a href="#">V1pLWRP-</a>	11.4.13	Submitter seeks less reliance on farm plans and good management practice to effect the needed change in	Oppose in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist, therefore any plan that does

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	Demeter	<a href="#">1018</a>		land use practice.		not make extensive use of farm plans and good management practice will not have legal integrity.
52312	Mrs Jane Demeter	<a href="#">V1pLWRP-1019</a>	11.4.14	Submitter seeks less reliance on farm plans and Good Management Practice to effect the needed change in land use practice.	Oppose in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist, therefore any plan that does not make extensive use of farm plans and good management practice will not have legal integrity.
52312	Mrs Jane Demeter	<a href="#">V1pLWRP-1012</a>	11.4.21	Submitter seeks shorter timeframes for achieving water quantity limits to limit the risk of not meeting NPS Freshwater Management requirements and Canterbury Water Management Strategy targets (timeframes not specified).	Support in part	The catchment target and limit for nitrogen loss may well be able to be attained earlier than is required by the Variation, however the fact remains that we will have little idea of our ability to reach this target (how much change will be required or what it might cost) prior to completion of the Matrix of Good Management project.
52312	Mrs Jane Demeter	<a href="#">V1pLWRP-1008</a>	11.4.6	Amend Policy to include shorter timeframes for achieving the nutrient loads and water quality and quantity limits to limit the risk of not meeting NPS Freshwater Management requirements and Canterbury Water Management Strategy targets (timeframes not specified).	Support in part	The catchment target and limit for nitrogen loss may well be able to be attained earlier than is required by the Variation, however the fact remains that we will have little idea of our ability to reach this target (how much change will be required or what it might cost) prior to completion of the Matrix of Good Management project.
52173	Mrs Myra Manson	<a href="#">V1pLWRP-54</a>	11.5.21	Amend requirement for resource consent and provide a precise definition of 'drain' to which this rules applies.	Support in part	Improved precision around the meaning of the word 'drain' would improve the plan.
52173	Mrs Myra Manson	<a href="#">V1pLWRP-55</a>	11.4.12	Delete requirement to exclude stock from drains, which is impracticable, and define what is meant by a drain.	Support in part	Improved precision around the meaning of the word 'drain' would improve the plan.
52173	Mrs Myra Manson	<a href="#">V1pLWRP-57</a>	11.4.14	Delete reference to percentage in Policy 11.4.14(b), as more science is required to know if the percentages are correct.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52180	Mrs Susan Thornley	Entire submission	Entire submission		Support in part	The Federation supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support

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						are as expressed by the submitter, or as expressed for equivalent points in other parts of our other further submissions.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-365</a>	Section 11 - Selwyn Waihora	Include a new objective: <u>To restore the mauri of Te Waihora while maintaining the prosperous land-based economy and thriving communities.</u>	Support in part	A suitably worded Objective will guide the development and implementation of the sub-regional management framework for the Selwyn/Waihora Catchment. Catchment-focused policies and rules potentially out of scope without an Objective. Finally there are few if any disadvantages in including an Objective.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-370</a>		Amend to replace Policies 11.4.6 to 11.4.17 with the following <u>1.</u> <u>(a) In recognition that Te Waihora/Lake Ellesmere is a taonga and of immense importance to Ngāi Tahu and to ensure that the Mauri of Te Waihora/Lake Ellesmere is resorted and the water quality outcomes are met within the Selwyn-Te Waihora catchment, over time reduce the amount of contaminants entering Te Waihora/Lake Ellesmere so that a TLI score of 4.8 is achieved; and</u> <u>(b) As a first step towards achieving the water quality outcomes with the Selwyn-Te Waihora Catchment the total amount of nitrogen entering the catchment is limited to that set out within Table 11 (i).</u> <u>2. Reduce the discharge of contaminants entering the catchment from wastewater systems by:</u> <u>(a) Prohibiting the discharge of untreated wastewater, liquid waste or sludge waste from either community, industrial or trade process or on-site domestic wastewater systems directly to groundwater or surface waterways;</u> <u>(b) From 2025 prohibiting the discharge of treated wastewater, liquid waste or sludge waste from either community, industrial or trade process or on-site domestic wastewater systems directly to groundwater or surface waterways;</u>	Support in part	Much of what the submitter seeks is consistent with the submission of Federated Farmers which seeks the replacement of policies 11.4.6 to 11.4.17 with new policies that provide for management of diffuse discharges of nitrogen from farms, without the legal gaps in the notified plan. Despite our overall support, Federated Farmers does not support: <ul style="list-style-type: none"> <li>• The use of a 15 kg/ha/annum threshold across the entire catchment (20 kg is required on light or very light soils);</li> <li>• A TLI of 4.8 is not achievable within the life of the Plan and is far lower than the TLI of 6.6/6 included in Table 11(b) Freshwater Outcomes for Selwyn Waihora Catchment Lakes;</li> <li>• The exclusion of stock from all surface water and drains, which is not practically achievable in the hill and high country.</li> </ul>

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				<p><u>(c) Enabling the discharge of treated wastewater, liquid waste or sludge waste from either community, industrial or trade process or on-site domestic wastewater systems to land provided:</u></p> <p><u>(i) On-site domestic wastewater systems which existed as of 13 February 2014 comply with Section 6.3 of New Zealand Standards AS/NZS 1547:2002 - On-site Domestic Wastewater Management by 1 January 2019;</u></p> <p><u>(ii) All new on-site domestic wastewater systems comply with Section 6.3 of New Zealand Standards AS/NZS 1547:2002 - On-site Domestic Wastewater Management;</u></p> <p><u>(iii) Community and industrial or trade process wastewater systems which existed as of 13 February 2014 have adopted Best Practicable Options to meet load limit by 1 January 2019; and</u></p> <p><u>(iv) All new community or industrial or trade process wastewater systems to meet the load limit.</u></p> <p><u>3. Reduce the loss of contaminants from farming activities into the catchment by:</u></p> <p><u>(a) Excluding livestock from all waterways, including drains; and</u></p> <p><u>(b) Providing setbacks from grazing and cultivation from waterways and where appropriate riparian planting.</u></p> <p><u>(c) Requiring all farming practices to implement the good management practices listed in Schedule 24 to minimize the loss of contaminants into water;</u></p> <p><u>(d) Avoiding any increase in nitrogen-nitrate loss is the estimated nitrogen loss from a farm estimated using OVERSEER<sup>®</sup> is greater than 15kg/ha/year; and</u></p> <p><u>(e) Requiring those framings practices with nitrogen-nitrates losses which are estimated using OVERSEER<sup>®</sup> to exceed 15kg/ha/yr to progressively reduce their nitrogen-nitrate losses in accordance with Policy 4.</u></p> <p><u>4.</u></p> <p><u>(a) By 1 July 2016 include by way of a plan change a schedule of maximum nitrogen loss rates for farm</u></p>		

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				<p><u>activities on soil types within the catchment, which farming activities must comply with by 2022; or</u>  <u>(b) If no such schedule exists then from 01 July 2017 limit the loss of nitrogen-nitrates from farming activities which are estimated using OVERSEER<sup>®</sup> to exceed 15kg/ha/year in the following way:</u>  <u>(i) Avoid any increase in estimated nitrogen loss from any farming activity whose estimated nitrogen loss using OVERSEER<sup>®</sup> is greater than 15kg/ha/year; and</u>  <u>(ii) Prohibit any farming activity having nitrogen losses estimated using OVERSEER<sup>®</sup> which exceed 80kg/ha/year.</u></p> <p><u>5. Require rural activities to either prepare and implement a nutrient budget using OVERSEER<sup>®</sup> (or an alternative method) or keep sufficient records as per Schedule X to enable a nutrient budget to be prepared using OVERSEER<sup>®</sup> or an alternative method).</u></p> <p><u>6. To progressively implement Farm Environment Plans within the catchment where the discharge from the farming activity or farm enterprise discharge is greater than 15kg/ha/year:</u>  <u>(a) For farming activities or farm enterprise, greater than 10ha in area and located within the Cultural Landscape/Values Management Area, require Farm Environment Plans from 1 January 2016;</u>  <u>(b) For farming activities or farm enterprise, greater than 50ha in area and located outside the Cultural Landscape/Values Management Area, require Farm Environment Plans from 1 January 2017;</u>  <u>(c) For farming activities or farm enterprise, less than 50ha but greater than 10ha in area and located outside the Cultural Landscape/Values Management Area, require Farm Environment Plans from 1 January 2020.</u></p> <p><u>7. The Farm Environment Plans prepared in accordance with Schedule 7 will:</u>  <u>(a) Where the current nitrogen discharge rate exceeds 15kg/ha/year</u></p>		

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				<p>(i) Practices to be implemented over a specified timeframe which will ensure that the discharge is not more than the nitrogen/phosphorus discharge loss rate as calculated using either the Matrix of Good Management or an alternative method; and</p> <p>(ii) Practices to be implemented over a specified timeframe which will ensure the discharges are reducing towards achieving a discharge loss of no more than a 15kg/ha/year.</p> <p>(b) Identify and provide mitigation for any environmental risk of the farming operation;</p> <p>(c) Identify methods for minimizing sediment loss from the property;</p> <p>(d) How stock will be excluded from waterways (rivers, streams, drains, wetlands and springs);</p> <p>(e) Identify and implement methods for ensuring that water is used efficiently;</p> <p>(f) Identify and implement methods for addressing the effects on water quality from land drainage water.</p>		
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-383</a>	11.4.6	Delete Policy 11.4.6 Submitter has proposed replacing Policies 11.4.6 to 11.4.17 with alternative policies.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-389</a>	11.4.8	Delete Policy 11.4.8 Submitter has proposed replacing Policies 11.4.6 to 11.4.17 with alternative policies.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-390</a>	11.4.9	Delete Policy 11.4.9 Submitter has proposed replacing Policies 11.4.6 to 11.4.17 with alternative policies.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.

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52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-391</a>	11.4.10	Delete Policy 11.4.10 Submitter has proposed replacing Policies 11.4.6 to 11.4.17 with alternative policies.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-392</a>	11.4.11	Delete Policy 11.4.11 Submitter has proposed replacing Policies 11.4.6 to 11.4.17 with alternative policies.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-393</a>	11.4.12	Delete Policy 11.4.12 Submitter has proposed replacing Policies 11.4.6 to 11.4.17 with alternative policies.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-394</a>	11.4.13	Delete Policy 11.4.13 Submitter has proposed replacing Policies 11.4.6 to 11.4.17 with alternative policies.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-395</a>	11.4.14	Delete Policy 11.4.14 Submitter has proposed replacing Policies 11.4.6 to 11.4.17 with alternative policies.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-396</a>	11.4.15	Delete Policy 11.4.15 Submitter has proposed replacing Policies 11.4.6 to 11.4.17 with alternative policies.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-397</a>	11.4.16	Delete Policy 11.4.16 Submitter has proposed replacing Policies 11.4.6 to 11.4.17 with alternative policies.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.



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52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-398</a>	11.4.17	Delete Policy 11.4.17 Submitter has proposed replacing Policies 11.4.6 to 11.4.17 with alternative policies.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-399</a>	11.4.20	Amend Policy 11.4.20 as follows: 11.4.20 Enable managed aquifer recharge and targeted stream augmentation <del>to assist with</del> for the benefit of and improvements to lowland stream flows where: (a) Any effects on Ngāi Tahu values, including but not limited to the abundance of and quality of mahinga kai and the mixing of waters are considered appropriate by Ngāi Tahu (b) There is no adverse effects upon availability and quality of drinking water supplies; and (c) There is no reduction in amount of or quality of natural wetlands; and (d) Any adverse impact upon fish migration; and (e) There is no reduction in any areas of significant indigenous vegetation or biodiversity.	Support in part	The Federation agrees that 11.4.20 requires refinement as managed aquifer recharge could result in various adverse effects. The following matters should also be included: <ul style="list-style-type: none"> <li>• Risks to health and safety;</li> <li>• Damage to buildings or property;</li> <li>• Reduced ability to access or make use of production land.</li> </ul>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-404</a>	11.4.21	Delete Policy 11.4.21 Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-405</a>	11.4.22	Delete Policy 11.4.22 Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-406</a>	11.4.23	Delete Policy 11.4.23  Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>

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52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-407</a>	11.4.24	Delete Policy 11.4.24 Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-408</a>	11.4.25	Delete Policy 11.4.25 Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-409</a>	11.4.26	Delete Policy 11.4.26 Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-410</a>	11.4.27	Delete Policy 11.4.27 Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-411</a>	11.4.28	Delete Policy 11.4.28 Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-412</a>	11.4.29	Delete Policy 11.4.29 Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-413</a>	11.4.30	Delete Policy 11.4.30 Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>

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52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-414</a>	11.4.31	Delete Policy 11.4.31 Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-415</a>	11.4.32	Delete Policy 11.4.32 Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-387</a>	11.4.7	Delete Policy 11.4.7 Submitter has proposed replacing Policies 11.4.6 to 11.4.17 with the alternative policies.	Oppose in part	Refer to point ID <a href="#">V1pLWRP-401</a>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-401</a>	11.4 Policies	Amend to replace Policies 11.4.21 to 11.4.32 with the following: 1. The catchments surface water and groundwater resource are managed as a single resource to ensure that the overall ground water levels and pressures are maintained or improved and the flows within the catchments surface water resources are improved. 2. The overall volume of water which can be allocated within the catchment is limited to that contained within Tables 11 (d), 11(e), 11(f) and 11(g). 3. Prohibit the allocation of surface or groundwater which may either singularly or cumulatively result in either the catchment wide or surface and groundwater specific allocations as set out within Tables 11 (d), 11(e), 11(f) and 11(g) being exceeded. 4. Recognise that both Waikewai Creek and Taumutu Creek are wāhi taonga and of immense cultural significance to both Taumutu and Ngāi Tahu and prohibit any surface water abstraction and any groundwater abstraction where there is either a direct or high stream depletion effect. 5. Prohibit the in-stream damming of the full flow on the	Oppose in part  Support in part	<p>The Federation <u>opposes in part</u> the relief sought at 'points 2, and 8' because the flow and allocation regimes provided by Tables 11 (d), 11(e), 11(f), and 11(g) are not sustainable without the Central Plains Water Scheme. The negative economic and social outcomes of an overly conservative allocation regime, the incomplete technical basis to support it, and actions that will be required if Central Plains Water does not proceed are further discussed in the submissions of Federated Farmers, Irrigation New Zealand and other primary sector groups.</p> <p>The Federation <u>opposes in part</u> the relief sought at 'point 3' because water quantity limits are based on incomplete information. We do not know if the adverse effects of the subject activities are inappropriate in all circumstances, so it is not appropriate to prohibit them.</p> <p>The Federation <u>supports in part</u> the relief sought at 'point 6' because 'reasonable use' is preferred to 'demonstrated' use which can negatively impact cropping farmers or horticulturalists whose water needs vary</p>

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				<p>main stem of Waikirikiri/Selwyn River and Waiāniwaniwa River.</p> <p>6. Require by 2017, or upon transfer, all surface and groundwater permits to contain an annual volume which is based upon the reasonable use test set out within policy 14.</p> <p>7. Enable the storage of alpine water provided the storage does not:</p> <p>(a) Adversely impact upon Ngāi Tahu cultural values including, but not limited to, the abundance of and quality of Mahinga Kai and the mixing of waters, unless the adverse impacts on cultural values can be addressed to the satisfaction of Ngāi Tahu; and</p> <p>(b) Reduces the availability and quality of drinking water from that available as of 13 February 2014; and</p> <p>(c) There is no reduction in amount of or quality of natural wetlands; and</p> <p>(d) Any adverse impact upon fish migration; and</p> <p>(e) There is no reduction in any areas of significant indigenous vegetation or biodiversity.</p> <p>8. Upon replacement of any surface water permit or groundwater permit and on all permits by 2025 where there is either a direct, high or moderate stream depletion effect, the minimum flows and partial restrictions as set out within Table 11 (c) apply.</p> <p>9. Upon replacement of any groundwater permit which had been previously been subject to 'adaptive management conditions'; 'adaptive management conditions' shall continue to apply.</p> <p>10. To ensure that overall groundwater levels within the West Melton Special Zone are maintained, groundwater permits shall be subject to groundwater trigger levels as set out within Table 11 (h)</p> <p>11.</p> <p>(a) To ensure that overall groundwater levels outside the West Melton Special Zone are maintained and improved to provide flows within the catchments</p>		<p>significantly from year to year.</p> <p>The Federation <u>opposes in part</u> the relief sought at 'point 13(a)(i) because 8.5 year reliability does not make sufficient provision for sustainable farming. 9 year reliability is preferred. The Federation refers to the submission and further submissions of Irrigation New Zealand in this regard.</p> <p>The Federation <u>supports in part</u> the relief sought at 'point 14' because it is an improvement on the equivalent provisions in the notified Variation, which will hinder and discourage water transfer.</p>

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				<p>streams and waterways, as a result of alpine water being brought into the catchment, Environment Canterbury shall monitor the catchments groundwater levels.</p> <p>(b) Should this monitoring show that the introduction of alpine water is not improving the overall groundwater levels and stream flows so that by 2025 minimum flows within the surface waterways can be raised, then Environment Canterbury shall implement an alternative approach to reduce over allocation within the catchment in accordance with Policy 12.</p> <p>12. Every water permit holder shall receive an annual volume consisting of:</p> <p>(a) A primary allocation calculated in accordance with either sub clause (b) or (c) of the reasonable use test as set out within policy 14; and a secondary annual volume which is that which is necessary to ensure reliability in 8.5 years out of 10. There shall be no transfer of the secondary annual volume.</p> <p>(b) A mechanism to indicate that groundwater levels are reaching unacceptably low levels and a mechanism for ceasing the taking of groundwater whenever groundwater levels fall below a specified level.</p> <p>13. To determine the reasonable use the following shall be applied:</p> <p>(a) For water permit holders who also hold shares in an irrigation scheme an annual volume from all sources of irrigation water shall be either:</p> <p>(i) That required to meet demand conditions in 8.5 years out of 10 using an application efficiency of 80% or</p> <p>(ii) The demonstrated the rate and volume of use; or</p> <p>(iii) That based upon the implementation of the most efficient and effective irrigation practices for a soil type.</p> <p>(b) For water permit holders who do not hold shares in an irrigation scheme an annual volume shall be either:</p> <p>(i) That contained within Schedule 10 of the pLWRP; or</p> <p>(ii) The demonstrated the rate and volume of use; or</p>		

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
				<p>(iii) That based upon the implementation of the most efficient and effective irrigation practices for a soil type.</p> <p>14. Enable the transfer of water provided the transfer does not:</p> <p>(a) Result in more water physically being abstracted from either the groundwater or surface water resource (i.e. one has to demonstrate that the water being transferred has been physically used in the past); and</p> <p>(b) Result in the groundwater being transferred from 'downs - plains' to 'up - plains' as shown on the Planning Maps; or</p> <p>(c) Result in the transfer of surface or groundwater permits from a person who holds irrigation scheme shares to a person who either does not hold irrigation scheme shares or holds irrigation scheme shares in a different irrigation scheme; or</p> <p>(d) Result in the transfer of a surface water permit from one surface waterway to another surface waterway unless the two surface waterways are physically connected; or</p> <p>(e) Result in the reduction in the reliability of supply to any ground and surface water permit holder, unless that permit holder has provided their written permission.</p>		
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-418</a>	Table 11(g): Surface Water Allocation Limits	Amend Table 11(g) to include a surface water allocation for all of the waterways. The surface water allocation put within this table should be based upon either the amount of water able to be taken between the minimum flow and when pro-rata restrictions start as per Table 11 (c) or 30% of 7day Mean Annual Low Flow (MALF) whichever is the lesser. The only expectation is for Waikekewai and Taumutu Creek where an allocation limit of '0' should be set.	Oppose in part	<p>The Federation opposes in part the relief sought because the amendments sought to Table 11(g) will result in an excessively stringent flow and allocation regime</p> <p>The negative economic and social outcomes of the relief sought, incomplete technical basis of it, and nature of actions that will be required if Central Plains Water does not proceed are further discussed in the submissions of Federated Farmers, Irrigation New Zealand and other primary sector groups.</p>
52233	Nga Rūnanga and Te Rūnanga	<a href="#">V1pLWRP-</a>	9.5.11	Amend Rule 5.128 to include a new condition: <u>"Any take within the West Melton Special Zone</u>	Oppose in part	The relief sought appears to be out of scope with the Variation.

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	O Ngāi Tahu	<a href="#">422</a>		<u>complies with the groundwater level restrictions in Table X of Section 9.6.2".</u>		
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-423</a>	11.5.6	<p>Amend Rule 11.5.6 to include farming enterprise as follows:  <b>Despite any of Rules 11.5.7 to 11.5.13, the use of land for a farming activity or farming enterprise in the Selwyn-Waihora catchment is a permitted activity provided the following conditions are met: AND</b></p> <p>Replacing Condition 1</p> <p>1. <u>(a) A nutrient budget has been prepared and implemented in accordance with OVERSEER<sup>®</sup> or an alternative method approved by Environment Canterbury;</u> or  <u>(b) records have been kept in accordance with Schedule X;</u> and</p> <p><b>AND</b></p> <p>Amending Conditions 2 &amp; 3</p> <p>2. <u>The property or farming enterprise is less than 10 5 hectares in area and the nitrogen loss calculation for the property or faming enterprise is less than 15kg/ha/year;</u> or  3. <u>The property or farming enterprise is greater than 10 hectares in area and the nitrogen loss calculation for the property or faming enterprise is less than 15kg/ha/year .</u></p>	Oppose in part	The Federation does not agree that it is in the best interests of farmers or the environment to require the keeping of records and the preparation of an Overseer nutrient budget for all farms, no matter how insignificant in the context of catchment water quality.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-420</a>	(New Heading) 11.11 Schedules	Add new Schedule within the pLWRP which sets out the information needed to be kept which would enable OVERSEER <sup>®</sup> to be run in the future.	Support in part	A potentially helpful plan provision. It is inefficient to require all farms to run Overseer.
52233	Nga Rūnanga and Te Rūnanga	<a href="#">V1pLWRP-</a>	11.5 Rules	Amend to include a new rule as follows: <b><u>From 1 January 2016 the use of land for a farming</u></b>	Support in part	The Federation agrees that it is unrealistic to complete Farm Environment Plans in the Cultural Landscape/Value

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	O Ngāi Tahu	<a href="#">427</a>		<p><b><u>activity or a farming enterprise within the Cultural Landscape/Value Management Area is a controlled activity provided the following conditions are met:</u></b></p> <p>1. A Farm Environment Plan has been prepared and implemented in accordance with Schedule 7; and</p> <p>2. The farming activity or farming enterprise is not irrigated with water from an irrigation scheme.</p> <p><b><u>The exercise of control is restricted to the following matters:</u></b></p> <p>1. The quality of, compliance with the Farm Environment Plan; and</p> <p>2. The effects of the activity on Ngāi Tahu Cultural Values; and</p> <p>3. Stock exclusion from waterways; and</p> <p>4. Whether the farming activity is meeting the nitrogen loss calculation, calculated using the Matrix of Good Management or some alternative method approved by Environment Canterbury; and</p> <p>5. The potential benefits of the activity to the applicant, the community and the environment.</p>		<p>Management Area by 1 July 2015. The recognition and support of Nga Rūnanga and Te Rūnanga O Ngāi Tahu in this regard is appreciated.</p> <p>Notwithstanding the support of the Federation it is considered that a requirement for resource consent to continue to farm in the Cultural Landscape/Value Management Area is not necessary to achieve sustainable management of natural resources. We suggest that several of the control matters resemble conditions and that a same or similar outcome could be achieved with a permitted activity.</p>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-436</a>	11.5.10	<p>Amend Rule 11.5.10 as follows:</p> <p><b>"Until 1 January 2017 the use of land for a farming activity as part of a farming enterprise in the Selwyn-Waihora catchment is a discretionary permitted activity, provided the following conditions are met:"</b></p> <p><b>AND</b></p> <p>Amending Conditions (1) &amp; (2)</p> <p>1. A Farm Environment Plan has been prepared in accordance with Schedule 7 Part A and is provided to Environment Canterbury upon request ; and</p> <p>2. The nitrogen loss calculation for the farming enterprise has not increased above the nitrogen baseline; and</p> <p><b>AND</b></p> <p>Adding two new conditions</p>	Support	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.



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				<p>The farming enterprise is not irrigated with water from an irrigation scheme; and</p> <p>The farming enterprise is not located with the Cultural Landscape/Values Management Area.</p>		
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-437</a>	11.5 Rules	<p>Amend to include a new rule as follows:  <b><u>From 1 January 2017, the use of land for a farming activity as part of a farming enterprise in the Selwyn-Waihora catchment is a discretionary activity, provided the following conditions are met:</u></b></p> <p>1. The farming enterprise is not located with the Cultural Landscape/Values Management Area; and</p> <p>2. The farming enterprise is not irrigated with water from an irrigation scheme; and</p> <p>3. A Farm Environment Plan has been prepared in accordance with Schedule 7</p>	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-438</a>	11.5.13	<p>Amend Rule 11.5.13:  <b><u>From 1 January 2025 2037 , the use of land for a farming activity or farming enterprise where the nitrogen loss calculation for the property is greater than that calculated using Matrix of Good Management or 80 kg per hectare per annum, whichever is the lesser, is a prohibited activity.</u></b></p>	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-441</a>	11.5.21	<p>Amend 11.5.21 by removing the lake area from Condition (1):  The discharge is not within the <del>Lake Area in the</del> Cultural Landscape/Values Management Area.</p>	Oppose	The relief sought will extend the scope of a proposed rule that already presents significant difficulties for land users.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-442</a>	11.5 Rules	<p>Amend Rules 5.7, 5.8 and 5.9 of the pLWRP by adding the following condition:  <u>(x) From 1 January 2019 the discharge is located within the Selwyn-Te Waihora Catchment and:</u>  <u>(a) It does not comply with comply with Section 6.3 of New Zealand Standards AS/NZS 1547:2002 – On-site Domestic Wastewater Management ; or</u>  <u>(b) It is directly into surface or groundwater.</u></p>	Oppose in part	The relief sought appears to be out of scope with the Variation.

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52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-443</a>	11.5 Rules	Amend to include a new rule as follows: <b><u>From 1 January 2019 within the Selwyn-Te Waihora catchment the discharge of treated sewage sludge, bio-solids from either a community waste water treatment system or a domestic on-site waste water treatment system either directly into surface or groundwater or onto land in circumstances where the contaminant may enter water where the on-site systems does not comply with Section 6.3 of New Zealand Standards AS/NZS 1547:2002 - On-site Domestic Wastewater Management is a prohibited activity.</u></b>	Oppose in part	The relief sought appears to be out of scope with the Variation.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-444</a>	11.5 Rules	Amend to include a new rule as follows: <b><u>Within the Selwyn-Te Waihora catchment the discharge of untreated sewage sludge, bio-solids from either a community waste water treatment system or a domestic on-site waste water treatment system directly into surface or groundwater is a prohibited activity.</u></b>	Support in part	It is generally expected that untreated sewage, sludge, or bio-solids will not be discharged directly to water.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-445</a>	11.5.25	Amend Rule 11.5.25 as follows: <b><u>Within the Selwyn-Waihora catchment the discharge of any treated wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewerage, into or onto land, or into or onto land in circumstances where a contaminant may enter water is a discretionary activity where the following conditions are met:</u></b>	Oppose in part	Many effluent disposal systems rely in some degree of 'soil treatment', with design standards in place to ensure timing, rate and depth of application do not exceed the ability of soil biota to utilise and thereby 'treat' contaminants before they escape biologically active soil layers or run off. There is no need for the activity to be subject to a resource consent if achievement of design standards can be ensured.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-446</a>	11.5.26	Amend Rule 11.5.26 as follows: <b><u>Within the Selwyn-Waihora catchment the discharge of any treated wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewerage, into or onto land, or into or onto land in circumstances where a contaminant may enter</u></b>	Oppose in part	Many effluent disposal systems rely in some degree of 'soil treatment', with design standards in place to ensure timing, rate and depth of application do not exceed the ability of soil biota to utilise and thereby 'treat' contaminants before they escape biologically active soil layers or run off. There is no need for the activity to be subject to a resource consent if achievement of design

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				water that does not meet one or more of the conditions in Rule 11.5.25 is a non-complying activity.		standards can be ensured.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-447</a>	11.5 Rules	Amend to include a new rule as follows: <b><u>Within the Selwyn-Waihora catchment the discharge of any untreated wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewerage, into surface water, or into or onto land, or into or onto land in circumstances where a contaminant may enter water is a prohibited activity</u></b> :	Oppose in part	There is no compelling reason to make discharge of wastewater etc to land <i>in circumstances where it may enter water</i> subject to a prohibited activity.  Many land-based effluent disposal systems rely in some degree of 'soil treatment', with design standards in place to ensure timing, rate and depth of application do not exceed the ability of soil biota to utilise and thereby 'treat' contaminants before they escape biologically active soil layers, or else run off. Despite design standards, there will always be a possibility (however remote) of some indirect discharge to water, or adverse effects thereof.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-448</a>	11.5 Rules	Amend to include a new rule as follows: <b><u>From 2025 within the Selwyn-Waihora catchment the discharge of any treated wastewater, liquid waste or sludge waste from an industrial or trade process, including livestock processing, excluding sewerage, into surface water, or into or onto land, or into or onto land in circumstances where a contaminant may enter water is a prohibited activity</u></b> :	Oppose in part	There is no compelling reason to make discharge of wastewater etc to land <i>in circumstances where it may enter water</i> subject to a prohibited activity.  Many land-based effluent disposal systems rely in some degree of 'soil treatment', with design standards in place to ensure timing, rate and depth of application do not exceed the ability of soil biota to utilise and thereby 'treat' contaminants before they escape biologically active soil layers, or else run off. Despite design standards, there will always be a possibility (however remote) of some indirect discharge to water, or adverse effects thereof.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-449</a>	11.5.32	Amend Rule 11.5.32 as follows: Replace conditions (1) and (2) with: 1 The proposed take: <b><u>(a) In addition to all existing resource consented takes does not result in any exceedance of any of the allocation limits in Table 11 (e), 11 (f) and 11(g); or</u></b> <b><u>(b) Is a replacement of a lawfully established surface or</u></b>	Support in part	The Federation supports recognition of the concept of reasonable use inherent in the relief sought.

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				<p><u>groundwater take for which an application to continue the activity has been made under s124 of the RMA and there is no increase in the proposed rate of take and the annual volume and the proposed annual volume is reasonable for the intended use; and</u></p> <p>Amend condition (3):  <u>A surface water or a groundwater take with a <del>direct or high degree of</del> stream depletion effect greater than 5 L/s determined in accordance with Schedule 9, complies with the minimum flow and restriction regime in Tables 11(c) and 11(d); and</u></p> <p>Add condition:  <u>For the replacement of a lawfully established groundwater permit which has been subject to adaptive management conditions the replacement is subject to adaptive management conditions</u></p> <p>Add condition:  <u>A Farm Environmental Management Plan has been prepared and implemented in accordance with Schedule 7</u></p> <p>Add another matter of discretion under (6) and (7):  <u>The level of compliance with the Farm Environmental Management Plan prepared and implemented in accordance with Schedule 7.</u></p> <p>Amend Matter (7) (v):  <u>the appropriateness of applying the proposed adaptive management conditions</u></p> <p>Add another matter of discretion:  <u>The effects of the proposed take and use upon Ngāi Tahu cultural values.</u></p>		
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-450</a>	11.5.33	<p>Amend Rule 11.5.33 as follows:</p> <p>Replace Conditions 4 &amp; 5 with:  <u>The proposed groundwater take does not have a direct, high or moderate degree of stream depletion effect determined in accordance with Schedule 9; and</u></p>	Support in part	The relief sought replaces a prescriptive plan provision with an effects based one.

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				<p>Amend Condition 6 as follows:  <del>For an irrigation take the</del> <u>The proposed groundwater permit has an annual volume and maximum rate of take that sought has been calculated in accordance with using the 'reasonable use test method 1 in Schedule 10</u>  <u>policy 14</u> ; and            Add condition:  <u>A Farm Environmental Management Plan has been prepared and implemented in accordance with Schedule 7</u>            Add another matter of discretion:  <u>The level of compliance with the Farm Environmental Management Plan prepared and implemented in accordance with Schedule 7.</u>            Add another matter of discretion  <u>The effects of the proposed take and use upon Ngāi Tahu cultural values.</u></p>		
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-451</a>	Notification..	Delete notification wording (relates to Rule 11.5.33)	Support in part	Improvement to wording.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-452</a>	11.5.34	<p>Amend Rule 11.5.34 by adding two conditions:  <u>1 The proposed take in addition to all existing resource consented takes does not result in any exceedance of any of the allocation limits in Table 11 (e), 11 (f) and 11(g);</u> or  <u>2 The proposed take is a replacement of a lawfully established surface or groundwater take for which an application to continue the activity has been made under s124 of the RMA and there is no increase in the proposed rate of take and the annual volume and the proposed annual volume is reasonable for the intended use.</u></p>	Oppose in part	These conditions are unnecessary given the very limited application of the Rule. If these conditions are not met the rule will default to non-complying which does not recognise the potential positive environmental and economic effects of ally groundwater or surface water augmentation.

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52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-453</a>	11.5.35	Amend Rule 11.5.35 so that where an application which does not comply with the new conditions under Rule 11.5.33 becomes a non-complying activity.	Oppose in part	Unclear what is being sought that that Plan does not already provide.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-454</a>	11.5.37	<p>Amend Rule 11.5.37 as follows:</p> <p>Amend Rule 11.5.37 (2):</p> <p><u>In the case of surface water:</u></p> <p><u>(a) the point of take remains within the same surface water catchment; and</u></p> <p><u>(b) the take complies with the minimum flow, flow restrictions and allocation regime in tables 11 (c), 11 (d) and 11 (g) and;</u></p> <p><u>(c) the take does not result in a reduction in the reliability of supply to any other lawfully established surface water permit holder, unless that permit holder has provided their written approval; and</u></p> <p>Amend Rule 11.5.37 (3) (d):</p> <p><u>3 (d) The transfer is not from a person who holds shares in an irrigation scheme to a person who either does not hold irrigation scheme shares or irrigation scheme shares in a different irrigation scheme in the irrigation scheme area as shown on the planning maps;</u></p> <p>and</p> <p>Amend Rule 11.5.37 by adding a new condition:</p> <p><u>In the case of a partial transfer, the combined rate and volume of water being transferred and kept reflects that which can be demonstrated has been used in the past.</u></p> <p>Add another matter of discretion:</p> <p><u>The effects of the proposed take and use upon Ngāi Tahu cultural values</u></p> <p>Add another matter of discretion:</p> <p><u>For a partial transfer whether the combined rate of take and annual volume of the water being transferred and that being kept can be demonstrated as being physically taken in the past.</u></p>	Oppose in part	The Federation is concerned that the relief sought may result in loss of ability to transfer water, which would be a lost opportunity to benefit the community and the environment.

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52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-455</a>	11.5.40	Amend Rule 11.5.40 by adding a new condition: <u>The discharges is not directly into water</u>	Oppose in part	Discretion matter 5 already provides for various matters of importance to Ngāi Tahu. Accordingly, there is nothing to be gained by making the activity a full discretionary activity if it involves 'mixing' of waters.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-457</a>	Table 11(c): Selwyn Waihora Minimum Flows and Partial Restriction Regime for A Permits	Amend Table 11 (c) as follows: Hamner Road Drain increase the minimum flow to 260L/s; Hororata River increase the minimum flow to 382L/s; Kaituna River increase the minimum flow to 100L/s; LII increase the minimum flow to 290l/s Selwyn River at Whitecliffs increase the minimum flow to 713l/s; Silver Stream increase the minimum flow to 120l/s.	Support in part	The Federation appreciates relief sought as it makes the Plan more workable. Support in part only because information used to determine minimum flows is incomplete.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-458</a>	11.1a	Delete the definition of 'Drainage Management Plan' and amend to include a new schedule within the plan which sets out the matters which the management plan should address. "Schedule X" "Drainage Management Plans" 1. The location of the waterways subject to this plan; and 2. The works to be covered by this plan (i.e. vegetation removal, sediment removal, bank re-contouring); and 3. The identification and mitigation of the effects of the proposed works covered by this plan); and....".	Support in part	The relief sought reflects an effects-based approach and makes the plan more usable.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-459</a>	(New Heading) 11.11 Schedules	Delete the definition of Drainage Management Plan and amend to include a new schedule within the plan which sets out the matters which the management plan should address. <b>Schedule X</b> <b>Drainage Management Plans</b> 1. The location of the waterways subject to this plan;	Support in part	The relief sought reflects an effects-based approach and makes the plan more usable.

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				<u>and</u> <u>2. The works to be covered by this plan (i.e. vegetation removal, sediment removal, bank re-contouring); and</u> <u>3. The identification and mitigation of the effects of the proposed works covered by this plan); and....".</u>		
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-460</a>	Schedule 24 – Farm Practices	Amend Schedule 24 [Farm Practices] to include: <b>(a) Nutrient Management</b> <u>( iv) Practices to be implemented within defined timeframes to ensure that the nutrient loss is at or below that calculated using the Matrix of Good Management or an alternative method; and</u> <u>(v) Practices to be implemented within defined timeframes to ensure that the nutrient loss is tracking towards the trigger level.</u> <b>(c) Intensive Winter Grazing:</b> <u>(ii) The use of a 'paddock selection tool' or something similar when determining any paddocks to be used for winter fodder crops; and</u> <u>(iii) Practices to implemented to minimize the loss of sediment from the property, including but not limited to how the paddock is grazed and the use of 'run-off' blocks for wintering.</u>	Support in part	The relief sought reflects an effects-based approach and makes the plan more usable.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-461</a>	(New Heading) 11.11 Schedules	Amend to include a new schedule which enables OVERSEER <sup>®</sup> to be run. <b>Schedule X – Information to be kept</b> <u>(a) The site area to which the farming activity or farming enterprise relates;</u> <u>(b) Monthly stocking rates (numbers, types and classes) including breakdown by stock class;</u> <u>(c) Annual yield of arable or horticultural produce;</u> <u>(d) A description of the farm management practices used on each block including:</u> <u>(i) Ground cover – pasture, crops, fodder crops, non-grazed areas (including forestry, riparian and tree areas) and any crop rotation;</u>	Support in part	An improvement on a requirement for every farm to run and regularly update an Overseer budget, regardless of the actual environmental effect that will be achieved or secondary effects of increased rate of change of ownership of farms that are not fully developed.



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				<p>(ii) Stock management – lambing/calving/fawning dates and percentages, any purchases and sales and associated dates, types and age of stock;</p> <p>(iii) Fertiliser application – types and quantities per hectare for each identified block, taking into account any crop rotation;</p> <p>(iv) Quantities of introduced or exported feed;</p> <p>(e) Farm animal effluent, pig farm effluent, feed pad and stand-off pad effluent management including:</p> <p>(i) Area of land used for effluent application;</p> <p>(ii) Annual nitrogen loading rate and nitrogen load rate per application;</p> <p>(iii) Instantaneous application rate;</p> <p>(f) Irrigation – areas, rates, monthly volumes and system type.</p> <p>The information is to be collated for the period 1 July to 30 June in the following year.</p>		
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-462</a>	(New Heading) 11.11 Schedules	<p>Amend Schedule 7 Part B of LWRP By including the following matters</p> <p><b>OR</b></p> <p>Insert a new Schedule within Selwyn-Te Waihora Section which incorporates all matters within the existing Schedule 7 and the following additional matters.</p> <p>Additional matters Part B under “ The Plan shall contain as a minimum :...”</p> <p>(2) (x) The location of any tracks including any water tables, swales etc. which are used to convey stormwater;</p> <p>(2) (x) The location of farm infrastructure for example wool sheds, yards, feed pads, dairy shed etc.</p> <p><b>New Section - Risk Assessment</b></p> <p>A site specific environmental risk assessment undertaken by an independent person, which clearly identifies any risks to the environment from the farming</p>	<p>Support in part</p> <p>Oppose in part</p>	<p><u>Support in part</u> because Federated Farmers prefers the use of Farm Environment Plans to prescriptive regulatory tools.</p> <p><u>Oppose in part</u> because amendments relating to stock exclusion and winter management do not reflect what can actually be practically achieved, especially on hill and high country farms.</p>

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				<p><u>operation and set out measures which could avoid such risks.</u></p> <p><b><u>New Section – Irrigation Management</u></b></p> <p><u>A description of how the irrigation system will:</u></p> <p><u>(a) All irrigation systems installed or replaced after 1 January 2014 meet the Irrigation New Zealand Piped Irrigation Systems Design Code of Practice [2013], Irrigation New Zealand Piped Irrigation Systems Design Standards [2013] and the Irrigation New Zealand Piped Irrigation Systems Installation Code of Practice [2013].</u></p> <p><u>(b) The irrigation system application depth and uniformity are self-checked annually in accordance with the relevant Irrigation NZ Pre-Season Checklist and IRRIG8Quick Irrigation Performance Quick Tests for any irrigation system operating on the property.</u></p> <p><u>(c) Irrigation applications are undertaken in accordance with property specific soil moisture monitoring, or a soil water budget, or an irrigation scheduling calculator.</u></p> <p><u>(d) Records of irrigation system application depth and uniformity checklists, irrigation applications, soil moisture monitoring or soil water budget or irrigation scheduling calculator results and rainfall are kept and provided to the Canterbury Regional Council upon request.</u></p> <p><u>(5) (a) Nutrient management: <del>To maximise nutrient use efficiency while minimising nutrient losses to water</del> Practices to be implemented over a specified timeframe which will ensure that the discharge is not more than the nitrogen/phosphorus discharge loss rate as calculated using either the Matrix of Good Management or an alternative method; and practices to be implemented over a specified timeframe which will ensure the discharges are reducing towards achieving a discharge loss of no more than a 15kg/ha/year</u></p> <p><u>(5) (x) Wetlands and riparian management : To manage wetland and waterway margins to avoid damage to the bed and margins of a water body, avoid direct input of</u></p>		

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				<p><u>nutrients, and to maximise riparian margin nutrient filtering.</u></p> <p><u>(5) (x) On farm land drainage: Identify and implement methods for addressing the effects on water quality from land drainage water ;</u></p> <p><u>(5) (x) Stock exclusion from waterways: measures to be implemented to ensure that stock are excluded from all waterways, including, how stock access to intermittently flowing waters will be managed.</u></p> <p><u>(5) (x) Wintering management : To manage the risks of wintering practise to avoid sediment run-off from or increasing nutrient loss as a result of wintering practises.</u></p>		
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-429</a>	11.5.7	<p>Amend Rule 11.5.7 by:</p> <p>Deleting Condition (1)</p> <p><del>1. The nitrogen loss calculation for the property does not exceed 15 kg per hectare per annum; or</del></p> <p><b>AND</b></p> <p>Adding a new condition:</p> <p><u>The farming activity is not located within the Cultural Landscape/Values Management Area; and</u></p> <p><b>AND</b></p> <p>Adding a new condition:</p> <p><u>The farming activity is not irrigated with water from an irrigation scheme; and</u></p> <p><b>AND</b></p> <p>Amending Condition (4)</p> <p><del>2. The nitrogen loss calculation for the property is greater than 15 kg per hectare per annum and the nitrogen loss calculation for the property farming activity or farm enterprise will not increase above the nitrogen baseline; and</del></p> <p><b>AND</b></p> <p>Deleting condition (2)</p> <p><del>(4) From 1 July 2015, for properties within the Lake Area</del></p>	Oppose	<p>The relief sought will make all farming subject to nitrogen loss baseline, regardless of actual adverse effects and will remove the 15 kg/ha/annum threshold below which farming activities are generally allowed.</p> <p>The Federation notes that even with full uptake, 15 kilograms per hectare only equates to 10% of the catchment load. If farmers below the 15 kg per hectare threshold are unable to consolidate the flexibility provided by 11.4.12, they will be even more disadvantaged in terms of loss of flexibility and loss of profitable land use development options than they already have been under the notified Variation.</p> <p>The Federation considers that requiring all farms to baseline to current use, no matter how insignificant in terms of contribution to adverse effects of diffuse discharges will (in combination with other regulatory requirements) result in negative social and environmental effects that have not been considered by the submitter. The outcomes sought within the relief sought will be costly to achieve and are likely to result in little</p>

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				<del>in the Cultural Landscape/Values Management Area a Farm Environment Plan has been prepared and implemented in accordance with Schedule 7 Part A for all properties greater than 10 hectares.</del>		<p>environmental gain.</p> <p>The Federation is also aware that there are a number of older, more traditional farmers, almost all of whom are farming at the lower end of the scale in terms of nitrogen emission intensity, who are likely to have difficulty engaging with regulatory requirements such as Overseer budgets, farming to a baseline, and 'consent to farm' and will probably choose early retirement rather than deal with requirements such as farming to a baseline, or resource consent to continue to farm. The overall result will be a perverse outcome for the environment, and contravention of natural justice, as farms that have been deliberately farmed within the limitations of the environment, effectively forcibly change hands and are developed to recoup the cost of purchase.</p>
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-430</a>	11.5.8	<p>Amend Rule 11.5.8 as follows:</p> <p><b>From 1 January 2017, the use of land for a farming activity in the Selwyn-Waihora catchment is a permitted <u>Restricted Discretionary</u> activity, provided the following conditions are met:</b></p> <p><b>AND</b></p> <p>Delete condition 1</p> <p><del>1. The nitrogen loss calculation for the property does not exceed 15 kg per hectare per annum; and</del></p> <p><b>AND</b></p> <p>Add a new condition</p> <p><u>The farming activity is greater than 50 hectares in area;</u></p> <p><u>and</u></p> <p><b>AND</b></p> <p>Replace Condition 2 with</p> <p><del>2. A Farm Environment Plan has been prepared and implemented in accordance with Schedule 7 Part A for all properties greater than 10 hectares within the Lake Cultural Landscape/Values Management Area, and supplied to Canterbury Regional Council on request;</del></p>	Oppose	<p>The relief sought will make all farming subject to nitrogen loss baseline, regardless of actual adverse effects and will remove the 15 kg/ha/annum threshold below which farming activities are generally allowed.</p> <p>The Federation notes that even with full uptake, 15 kilograms per hectare only equates to 10% of the catchment load. If farmers below the 15 kg per hectare threshold are unable to consolidate the flexibility provided by 11.4.12, they will be even more disadvantaged in terms of loss of flexibility and loss of profitable land use development options than they already have been under the notified Variation.</p> <p>The Federation considers that requiring all farms to baseline to current use, no matter how insignificant in terms of contribution to adverse effects of diffuse discharges will (in combination with other regulatory requirements) result in negative social and environmental</p>

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				<p>and</p> <p><u>The farming activity is not located within the Cultural Landscape/Values Management Area; and</u></p> <p><b>AND</b></p> <p>Amend Condition 3</p> <p>3. A Farm Environment Plan has been prepared and implemented in accordance with Schedule 7 Part A for all properties greater than 50 hectare, and is supplied to Canterbury Regional Council on request;</p> <p><b>AND</b></p> <p>Delete condition 4</p> <p>4. For properties less than 50 hectares but greater than 20 hectares;</p> <p>(a) Until 31 December 2021, the Practices in Schedule 24 are being implemented; and</p> <p>(b) From 1 January 2022, a Farm Environment Plan has been prepared and implemented in accordance with Schedule 7 Part A;</p> <p><b>AND</b></p> <p>Add a new condition</p> <p><u>The farming activity is not irrigated with water from an irrigation scheme.</u></p> <p>Add new matters of discretion for amended Rule 11.5.8:</p> <p><b><u>The exercise of discretion is restricted to the following matters:</u></b></p> <p>1. <u>The quality of and compliance with the Farm Environment Plan; and</u></p> <p>2. <u>The effects of the activity on Ngāi Tahu Cultural Values; and</u></p> <p>3. <u>Stock exclusion from waterways; and</u></p> <p>4. <u>Whether the farming activity is meeting the nitrogen loss calculation, calculated using the Matrix of Good Management or some alternative method approved by Environment Canterbury; and</u></p> <p>5. <u>The potential benefits of the activity to the applicant,</u></p>		<p>effects that have not been considered by the submitter. The outcomes sought within the relief sought will be costly to achieve and are likely to result in little environmental gain.</p> <p>The Federation is also aware that there are a number of older, more traditional farmers, almost all of whom are farming at the lower end of the scale in terms of nitrogen emission intensity, who are likely to have difficulty engaging with regulatory requirements such as Overseer budgets, farming to a baseline, and 'consent to farm' and will probably choose early retirement rather than deal with requirements such as farming to a baseline, or resource consent to continue to farm. The overall result will be a perverse outcome for the environment, and contravention of natural justice, as farms that have been deliberately farmed within the limitations of the environment, effectively forcibly change hands and are developed to recoup the cost of purchase.</p>

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				the community and the environment.		
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-431</a>	11.5 Rules	<p>Amend to include a new rule as follows:  <b><u>From 1 January 2020 the use of land for a farming activity in the Selwyn-Waihora catchment is a Restricted Discretionary activity, provided the following conditions are met:</u></b></p> <p>1. The farming activity is greater than 10 hectares but less than 50 hectares in area; and  2. A Farm Environment Plan has been prepared and implemented in accordance with Schedule 7; and  3. The farming activity is not irrigated with water from an irrigation scheme; and  4. The farming activity is not located within the Cultural Landscape/Values Management Area.</p> <p>Add new matters of discretion for new rule:  <b><u>The exercise of discretion is restricted to the following matters:</u></b></p> <p>1. The quality of and compliance with the Farm Environment Plan; and  2. The effects of the activity on Ngāi Tahu Cultural Values; and  3. Stock exclusion from waterways; and  4. Whether the farming activity is meeting the nitrogen loss calculation, calculated using the Matrix of Good Management or some alternative method approved by Environment Canterbury; and  5. The potential benefits of the activity to the applicant, the community and the environment.</p>	Oppose	<p>The relief sought will make all farming subject to nitrogen loss baseline, regardless of actual adverse effects and will remove the 15 kg/ha/annum threshold below which farming activities are generally allowed.</p> <p>The Federation notes that even with full uptake, 15 kilograms per hectare only equates to 10% of the catchment load. If farmers below the 15 kg per hectare threshold are unable to consolidate the flexibility provided by 11.4.12, they will be even more disadvantaged in terms of loss of flexibility and loss of profitable land use development options than they already have been under the notified Variation.</p> <p>The Federation considers that requiring all farms to baseline to current use, no matter how insignificant in terms of contribution to adverse effects of diffuse discharges will (in combination with other regulatory requirements) result in negative social and environmental effects that have not been considered by the submitter. The outcomes sought within the relief sought will be costly to achieve and are likely to result in little environmental gain.</p> <p>The Federation is also aware that there are a number of older, more traditional farmers, almost all of whom are farming at the lower end of the scale in terms of nitrogen emission intensity, who are likely to have difficulty engaging with regulatory requirements such as Overseer budgets, farming to a baseline, and 'consent to farm' and will probably choose early retirement rather than deal with requirements such as farming to a baseline, or resource consent to continue to farm. The overall result will be a perverse outcome for the environment, and</p>

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						contravention of natural justice, as farms that have been deliberately farmed within the limitations of the environment, effectively forcibly change hands and are developed to recoup the cost of purchase.
52233	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	<a href="#">V1pLWRP-432</a>	11.5.9	Delete Rule 11.5.9. Submitter states it becomes redundant given their redrafting of Rules 11.5.6, 11.5.7, 11.5.8 and addition of two new Rules.	Oppose	<p>The redrafting of redrafting of Rules 11.5.6, 11.5.7, 11.5.8 sought by the submitter will make all farming subject to nitrogen loss baseline, regardless of actual adverse effects and will remove the 15 kg/ha/annum threshold below which farming activities are generally allowed.</p> <p>The Federation notes that even with full uptake, 15 kilograms per hectare only equates to 10% of the catchment load. If farmers below the 15 kg per hectare threshold are unable to consolidate the flexibility provided by 11.4.12, they will be even more disadvantaged in terms of loss of flexibility and loss of profitable land use development options than they already have been under the notified Variation.</p> <p>The Federation considers that requiring all farms to baseline to current use, no matter how insignificant in terms of contribution to adverse effects of diffuse discharges will (in combination with other regulatory requirements) result in negative social and environmental effects that have not been considered by the submitter. The outcomes sought within the relief sought will be costly to achieve and are likely to result in little environmental gain.</p> <p>The Federation is also aware that there are a number of older, more traditional farmers, almost all of whom are farming at the lower end of the scale in terms of nitrogen emission intensity, who are likely to have difficulty engaging with regulatory requirements such as Overseer</p>

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						budgets, farming to a baseline, and 'consent to farm' and will probably choose early retirement rather than deal with requirements such as farming to a baseline, or resource consent to continue to farm. The overall result will be a perverse outcome for the environment, and contravention of natural justice, as farms that have been deliberately farmed within the limitations of the environment, effectively forcibly change hands and are developed to recoup the cost of purchase.
52249	Ravensdown Fertiliser Co-operative Limited	Entire submission	Entire submission		Support in part	The Federation supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support are as expressed by the submitter, or as expressed for equivalent points in other parts of our other further submissions.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1304</a>	11.5 Rules	Retain Rules in section 11.5 with the provision that there is an added Policy in the Plan to allow for the review of Targets and Limits as set out in various Tables within 5 years of life of the Plan.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them. A commitment to review the Plan within 5 years would signal that this information is to be incorporated at an appropriate time.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1248</a>	Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan	Amend the Plan so that it is sufficiently reiterative to be able to make any necessary adjustments, including reviewing of consents at regular intervals, to ensure that sustainable management is achieved during the life of the Plan.	Oppose in part	The intent of the Variation is to create an iterative and adaptive approach to water management, an approach that is consistent with both the relief sought by the submitter and the preferred policy position of the North Canterbury Province of Federated Farmers. Despite its support the Federation considers that reviewing of consents at 'regular' intervals may be of limited utility in improving the environment relative to benefits achieved – the use of review clauses that respond to changing circumstances is preferred to arbitrary time limits.



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52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1251</a>	11.4 Policies	Amend policies by adding new Policy 11.4.1 (and renumber accordingly) to provide for the progressive reviewing and monitoring of the Policies and Rules in the Plan by way of Plan Change if necessary similar to what is provided in Policy 5.4 of the Hurunui Waiau Regional River Plan (HWRRP) and add an accompanying rule similar to Rule 10.2 of the HWRRP.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1253</a>	11.4.1	Amend Policy 11.4.1 to read: "Manage water abstraction and discharges of contaminants within the entire Selwyn-Waihora catchment to avoid cumulative effects on the water quality of Te Waihora/Lake Ellesmere and <u>the flow and quality of water in springs and tributaries flowing into Te Waihora/Lake Ellesmere.</u> "	Oppose in part	It is not practical to avoid adverse effects on a shallow confined lake of the size and physical context of Te Waihora/Lake Ellesmere.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1260</a>	11.4 Policies	Amend to include a new Policy to read or words similar: <u>"Manage the water abstraction and discharges of contaminants and irrigation and other activities to ensure significant indigenous vegetation and significant habitats of indigenous fauna are protected and opportunities for enhancement are taken where possible."</u>	Oppose in part	Various parts of the Variation include requirements to prepare Farm Environment Plans. It is expected that opportunities <u>significant indigenous vegetation and significant habitats of indigenous fauna</u> are identified and addressed through this process than prescribed through rules.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1261</a>	11.4 Policies	Amend to include a new Policy to read or words similar: <u>"Recognise the importance of the Selwyn-Te Waihora catchment for its recreational and amenity values and ensure the natural characters of its waterbodies are protected."</u>	Oppose in part	Various parts of the Variation include requirements to prepare Farm Environment Plans. It is expected that opportunities <u>significant indigenous vegetation and significant habitats of indigenous fauna</u> are identified and addressed through this process than prescribed through rules.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1263</a>	11.4.6	Amend Policy 11.4.6 to include a sentence at the end to read: <u>" These limits will be reviewed within 5 years. "</u>	Oppose in part	The Federation opposes the relief sought because it is prescriptive in that review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in developing Good Management Practice Nitrogen and

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						Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.
52265	Royal New Zealand Forest and Protection Society	<a href="#">V1pLWRP-1265</a>	11.4.7	Amend Policy 11.4.7 to include a sentence at the end to read: " <u>These limits will be reviewed within 5 years.</u> "	Oppose in part	The Federation opposes the relief sought because review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in developing Good Management Practice Nitrogen and Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.
52265	Royal New Zealand Forest and Protection Society	<a href="#">V1pLWRP-1266</a>	11.4.8	Amend Policy 11.4.8 to include a sentence at the end to read: " <u>These limits will be reviewed within 5 years.</u> "	Oppose in part	The Federation opposes the relief sought because review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in developing Good Management Practice Nitrogen and Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.
52265	Royal New Zealand Forest and Protection Society	<a href="#">V1pLWRP-1267</a>	11.4.9	Amend Policy 11.4.9 and add a sentence to end of policy to read: <u>"...these limits will be reviewed within 5 years..."</u>	Oppose in part	The Federation opposes the relief sought because review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in developing Good Management Practice Nitrogen and Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.
52265	Royal New Zealand Forest and Protection Society	<a href="#">V1pLWRP-1268</a>	11.4.10	Amend Policy 11.4.10 to include a sentence at the end to read: " <u>These limits will be reviewed within 5 years.</u> "	Oppose in part	The Federation opposes the relief sought because review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in developing Good Management Practice Nitrogen and Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.

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52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1269</a>	11.4.11	Amend Policy 11.4.11 to include a sentence at the end to read: " <u>These limits will be reviewed within 5 years.</u> "	Oppose in part	The Federation opposes the relief sought because review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in developing Good Management Practice Nitrogen and Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1270</a>	Table 11(i): Catchment Target and Limits for Nitrogen Losses from Farming Activities, Community Sewerage Systems and Industrial or Trade Processes	Amend Table 11 (i) to accommodate changes to Policies 11.4.6 to 11.4.11 (added text to read: " <u>...these limits will be reviewed within 5 years...</u> "	Oppose in part	The Federation opposes the relief sought because review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in developing Good Management Practice Nitrogen and Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1271</a>	11.4.12	Amend Police 11.4.12 to include a sentence: " <u>Provide for a review of the achievement and efficacy of the proposed reduction targets and nitrogen baseline within five years .</u> "	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them. A requirement for update or review will provide for incorporation of this information once it has been prepared.

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52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1273</a>	11.4.13	Amend Policy 11.4.13 to include a sentence: " <u>Provide for a review of the achievement and efficacy of the proposed reduction targets and nitrogen baseline within five years.</u> " or words to that effect.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them. A requirement for update or review will provide for incorporation of this information once it has been prepared.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1274</a>	11.4.14	Amend Policy 11.4.14 to include the sentence: " <u>Provide for a review of the achievement and efficacy of the proposed reduction targets and nitrogen baseline within five years.</u> " or words to that effect.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them. A requirement for update or review will provide for incorporation of this information once it has been prepared.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1275</a>	11.4.15	Amend Policy 11.4.15 to include a sentence: " <u>Provide for a review of the achievement and efficacy of the proposed reduction targets and nitrogen baseline within five years.</u> " or words to that effect.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them. A requirement for update or review will provide for incorporation of this information once it has been prepared.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1286</a>	11.4.21	Retain Policy 11.4.21 but seek that limits set out in Tables 11 (e) are able to be reviewed within 5 years to ensure they continue to be appropriate and action can be taken if it is shown not to be the case.	Oppose in part	The Federation opposes the relief sought because review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in deveood Management Practice Nitrogen and Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1288</a>	Table 11(c): Selwyn Waihora Minimum Flows and Partial	No specific decision requested. Submitter seeks that limits set out in Tables 11 (c) are able to be reviewed within 5 years to ensure they continue to be appropriate and action can be taken if it is shown not to be the case.	Oppose in part	The Federation opposes the relief sought because review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in deveood Management Practice Nitrogen and Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.

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			Restriction Regime for A Permits			
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1289</a>	Table 11(d) Selwyn Waihora Minimum Flows for B Permits	No specific decision requested. Seek that limits set out in Tables 11 (d) are able to be reviewed within 5 years to ensure they continue to be appropriate and action can be taken if it is shown not to be the case.	Oppose in part	The Federation opposes the relief sought because review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in developing Good Management Practice Nitrogen and Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1290</a>	Table 11(e): Combined Surface Water and Groundwater Allocation Limits for Selwyn-Waimakariri, Rakaia-Selwyn, and Little Rakaia Combined Surface and Groundwater Allocation Zones	No specific decision requested. Submitter seeks that limits set out in Tables 11 (e) are able to be reviewed within 5 years to ensure they continue to be appropriate and action can be taken if it is shown not to be the case.	Oppose in part	The Federation opposes the relief sought because review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in developing Good Management Practice Nitrogen and Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.

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52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1291</a>	11.4.28	Retain policy 11.4.28 but seek that limits set out in Tables 11 (c) and (d) are able to be reviewed within 5 years to ensure they continue to be appropriate and action can be taken if it is shown not to be the case.	Oppose in part	The Federation opposes the relief sought because review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in developing Good Management Practice Nitrogen and Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1292</a>	11.4.29	Retain Policy 11.4.29 but seek that limits set out in Tables 11 (c) are able to be reviewed within 5 years to ensure they continue to be appropriate and action can be taken if it is shown not to be the case.	Oppose in part	The Federation opposes the relief sought because review is required regardless of whether new information or changed legislation make it a worthwhile undertaking. The Federation prefers that the community's time, energy and resources are invested in developing Good Management Practice Nitrogen and Phosphorus Loss Rates, and in improving farm practice to reduce nitrogen loss.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1322</a>	11.5.42	Amend Rule 11.5.42 as follows: "The damming of the full flow of water within the bed of the main stem of the Selwyn River/Waikirikiriri between the mouth at or about map reference BX23:5559-5636 to BW21:9667-9703 and BX21:9752-8937, and within the bed of the Waiāniwaniwa River above the confluence with the Selwyn River/ Waikirikiriri <u>and all tributaries</u> , <del>at or about map reference BX22:2494 7347 to BW21:1130 9083</del> is a prohibited activity.	Oppose in part	The relief sought does not makes sufficient provision for damming and diversion of a minor nature as might occur with stock water systems (essential to sustain farming in the hill and high country), or construct bridges or culverts.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1323</a>	11.5.44	Amend Rule 11.5.44 ' The exercise of discretion is restricted to the following matters:" point 7 to read "The benefits of the activity to the <del>applicant</del> , community and <u>the</u> environment."	Oppose	Given that the rule provides for activities <i>for the sole purpose of habitat restoration</i> , the Federation does not agree that the benefit of the activity to the applicant ought to be be excluded as a discretion matter. The relief sought appears contrary to section 7(aa) of the RMA.
52265	Royal New Zealand Forest	<a href="#">V1pLWRP-</a>	Schedule 24 – Farm	Retain Schedule 24 (c) (i)	Oppose in part	The relief sought is opposed for the reasons given on the same point in the submission of the North Canterbury

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	and Bird Protection Society	<a href="#">1333</a>	Practices			Province of Federated Farmers.  The conditions described in the definition of 'Intensive Winter Grazing' in the notified Variation will arise in virtually any stocking situation on land during the winter months. Refinement is required so that the definition actually reflects the activity that the Council seeks to control.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1334</a>	Schedule 24 – Farm Practices	Amend Schedule 24 (d)(i) so there will be a minimum of a 5m uncultivated vegetative strip consistent with (c)(i).	Oppose	The relief sought is opposed for the reasons given on the same point in the submission of the North Canterbury Province of Federated Farmers. The relief sought would result in significant problems with loss of productive value and loss of control of land in riparian areas. It is far better for setbacks for cultivation etc to be determined on a case-by-case basis as will happen during the preparation of Farm Environmental Plans.
52265	Royal New Zealand Forest and Bird Protection Society	<a href="#">V1pLWRP-1301</a>	11.4.31	Amend Policy 11.4.31 to read: Prohibit in-stream damming of <del>the full flow</del> on the main stem of the Selwyn River/ Waikirikiri , and the Waianiwaniwa River <u>and all tributaries</u> above its confluence with the Selwyn River/ Waikirikiri.	Oppose	The relief sought does not makes sufficient provision for damming and diversion of a minor nature as might occur with stock water systems (essential to sustain farming in the hill and high country), or construct bridges or culverts.
52287	Synlait Farms Ltd	Entire submission	Entire submission		Support in part	The Federation by and large supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider community and the environment. Our reasons for support are as the reasons given by the submitter, or as provided for equivalent points raised in the submission and further submissions of Federated Farmers.  <u>Matters of particular significance or interest, and that are supported</u> , are identified in our further submissions on other parts of the submission of Synlait Farms Ltd.



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						Despite overall support for the submission and the aspiration expressed throughout for an improved outcome for the community and environment, Federated Farmers does not support all parts of the submission.. Aspects of the submission and relief sought that are <u>opposed</u> and reasons for opposition are identified in further submissions on other parts of the submission of Synlait Farms Ltd.
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-974</a>	11.4.1	Amend Policy 11.4.1 as follows: "Manage water abstraction and discharges of contaminants within the entire Selwyn waihora catchment to avoid <u>adverse</u> cumulative effects on the water quality of Te Waihora/Lake Ellesmere and flows of water in springs and tributaries flowing into Te waihora/Lake Ellesmere"	Support in part	The Federation supports the relief sought, but does not agree that it goes far enough. A more appropriate relief sought would be ... <i>avoid <u>any increase in significant cumulative adverse effects...</u></i>
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1013</a>	11.4.10	Amend the policy on meeting the nitrogen load limit for industrial and trade processes to "adjust the allocation above 106T to capture all consented discharges and allow for future growth in the zone"	Oppose in part	The Federation considers that industrial or trade waste is (or ought to be) applied to land in a controlled way at a timing, rate, and depth that enables 'treatment' in the biologically active parts of the soil column. It is unlikely therefore that <i>modelled</i> nitrogen loss will exceed 15 kg/hectare/annum. New activities should therefore be able to be provided for by proposed Rule 11.4.11.
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1020</a>	11.4.11	Amend Policy 11.4.11 to enable the greater of the two loss provisions to be considered: Enable the discharge of wastewater, liquid waste or sludge waste from an industrial or trade process into or onto land which cumulatively will result in the exceedance of the nitrogen load limit in Table 11(i) only in circumstances where the activity is replacing a farming activity and the discharge will not exceed <u>either the greater of 15 kg nitrogen per hectare per annum or the nitrogen baseline for the property</u> . Clarify the term 'replacing' as it is unclear and wastewater disposal and farming generally go hand in hand.	Support in part	The Federation agrees that wastewater disposal and farming often take place on the same land. It is not uncommon for example for milk drying plants to enter into agreements with nearby farmers to discharge milk processing by-products on their land, or to purchase silage cut from land used to dispose of such waste.



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52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1023</a>	11.4.12	Amend policy 11.4.12 to allow for a lead in time for the implementation of practices associated with Schedule 24, especially for some land uses outside dairy.	Support in part	Requirements to exclude stock from all surface water are unworkable in the hill and high country environment due to very high cost and loss of ability to use land. For most hill and high country farming situations, the priority resource management issues are adverse effects of proliferation of plant and animal pests and soil erosion, not the effects of stock access to surface water. Issues faced by Hill and High Country farmers bear little relationship to Schedule 24.
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1027</a>	11.4.12	Amend Policy 11.4.12 to allow for a lead in time for the implementation of stock exclusion [from drains, lakes, rivers and wetlands].	Support in part	Requirements to exclude stock from all surface water are unworkable in the hill and high country environment due to very high cost and loss of ability to use land. For most hill and high country farming situations, the priority resource management issues are adverse effects of proliferation of plant and animal pests and soil erosion, not the effects of stock access to surface water.
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1029</a>	11.4.12	No specific decision requested. Submitter seeks a multi-industry, working party to help develop awareness programmes and support the adoption of these practices on-farm. Support the adoption of these practices by getting resource users, industry and community involved in the framing of the communications, up skilling of professional capabilities and implementation strategies.	Support in part	The Federation agrees that <i>framing of the communications, up skilling of professional capabilities and implementation strategies</i> are likely to be very important to the success of the plan.
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1030</a>	11.4.13	No specific decision requested. Submitter states "people cannot make a fair attempt to understand the impacts of this policy until the Matrix of Good Management work is complete and nutrient baselines are established."	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-</a>	11.1a	Amend definition of 'Good Management Practice Nitrogen and Phosphorus Loss Rates' to be more	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended

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		<a href="#">1031</a>		robust and allow for some clear linkages on what these numbers may mean to business and communities.		to have legal integrity without them.
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1146</a>	11.4.14	Amend Policy 11.4.14 to provide a more equitable reduction in nitrogen loss rates across the various industries (specifically the 30% reduction for dairy). Submitter considers it would be important to first accurately quantify the base loads and benchmark for operational performance before one can assign reduction targets. A better allocation mechanism may be provided at the hearing or discussed with industry prior to the hearing.	Support in part	The submission demonstrates that further work needs to be done before benchmarks and reduction targets can be put in place. A further Plan Change or Variation will need to be notified once the Matrix of Good Management information is available to support an appropriate nitrogen management regime for the catchment.
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1161</a>	11.4.17	Amend policy 11.4.17 to allow a lead in time to meet 'improved nitrogen loss rates' in Policy 11.4.14 for properties converting from dryland to irrigated land use within an irrigation scheme. Land owners currently cannot assess the effect of the policy against operational requirements as Good Management Practice loss rates have not been set through the Matrix of Good Management yet.	Support in part	Good Management Practice Nitrogen and Phosphorus Loss Rates do not yet exist so the plan must be amended to have legal integrity without them.
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1158</a>	11.4.16	Retain the nitrogen loss of 80 kg per hectare per annum which land owners should be operating at or below by 2037. Submitter supports the gathering of actual data to understand and scope the impact on land owners.	Support in part	The Federation considers that the relief sought reinforces concerns about the status of the Variation without Good Management Practice Nitrogen and Phosphorus Loss Rates. Until the Matrix of Good Management project is complete, we will not know if nitrogen loss to 80 kg/ha/annum is attainable for all land uses by 2037.
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1197</a>	11.5.7	Amend Rule 11.5.7 by allowing a more realistic timeframe for the adoption of Farm Practices in Schedule 24 (condition 3) as this condition is currently enforceable now.	Support in part	There are a number of more traditional dryland farmers in the catchment where there is no practical environmental advantage in enforcing Schedule 24, and where doing so is likely to lead to early than expected retirement decisions for older farmers, which will not advantage anyone involved. The Federation will speak more about this issue at the hearing.

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52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1208</a>	11.5.9	Amend Rule 11.5.9. Submitter seeks that the matters of discretion consider the effectiveness of Farm Environment Plan practices on meeting or reducing losses on-farm and not explicitly refer to 'compliance'. Submitter objects to matters of discretion points 1 and 2 as written.	Support in part	The Federation sees that effectiveness is a far greater issue than 'compliance' as such. 'Non-compliance' could occur for any number of reasons with a document as complex as a Farm Environmental Plan, and is in any case an enforcement issue, It should not be used as the basis for decline of an application for resource consent.
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1227</a>	11.1a	Amend the 'Nutrient Loss Calculation' definition to allow for greater flexibility so long as the nutrient baseline is not exceeded. This means the greater of:  The nitrogen loss calculation; or  The annual discharge of nitrogen below the root zone utilising the highest given loss over the previous four years.  [A decision is yet to be made by the Hearing Commissioners on whether this is a valid submission point.]	Support in part	Base-lining as an average does not allow for variations in enterprise, stock type, or cropping regimes, impact of drought, or irrigation development or pasture renewal that are likely on any farm other than 'an established dairy farm' over a time period as significant as the baseline period, nor does it fairly reflect what is taking place on the land. In other words a base-lining approach without recognition of changes over time will enforce farming to the least intensive farming activity over the baseline period.
52287	Synlait Farms Ltd	<a href="#">V1pLWRP-1228</a>	11.1a	Amend the definition of 'Baseline Land Use' in light of those land owners who obtained a consent or change between 2009-2013 for discharge or building consents.	Support in part	The granting of resource consents to undertake relevant activities is evidence of bona fide of past ownership, acquisition, or investment of resources for a particular purpose that should be recognised in the application of any retrospective controls.
52215	Te Taumutu Rūnanga	<a href="#">V1pLWRP-259</a>	11.4.1	Retain Policy 11.4.1	Oppose in part	It is not practical to avoid adverse effects on a shallow confined lake of the size and physical context of Te Waihora/Lake Ellesmere.
52215	Te Taumutu Rūnanga	<a href="#">V1pLWRP-268</a>	11.4.6	No specific decision requested. Te Taumutu Rūnanga concerned with 2037 as the date to reach the catchment target and limit for nitrogen losses. Submitter seeks to ensure that the plan review process is used to	Support in part	The catchment target and limit for nitrogen loss may well be able to be attained earlier than is required by the Variation, however the fact remains that we will have little idea of our ability to reach this target (how much change

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				identify any opportunities to bring this date forward if we have made significant progress.		will be required or what it might cost) prior to completion of the Matrix of Good Management project.
52215	Te Taumutu Rūnanga	<a href="#">V1pLWRP-281</a>	11.4.12	Retain Policy 11.4.12 (a) (b) and (d). Retain intent of 11.4.12 (c) but submitter notes that implementing a Farm Environment Plan from 1 July 2015 within the Cultural landscape/Values Management Area may not be feasible given the timing of the Variation and will likely need to be 2016.	Support in part	The Federation agrees that it is unrealistic to achieve compliance by 1 July 2015. The recognition and support of Te Taumutu Rūnanga in this regard is appreciated.
52215	Te Taumutu Rūnanga	<a href="#">V1pLWRP-285</a>	11.4.16	Amend Policy 11.4.16 to clearly state that 80 kg/N/ha/yr is a limit for high leaching activities. Assess the potential to bring this level down from 80 (e.g. to 70) when the plan is reviewed, consistent with continuous improvement.	Support in part	The Federation considers that the relief sought reinforces concerns about the status of the Variation without Good Management Practice Nitrogen and Phosphorus Loss Rates. Until the Matrix of Good Management project is complete, we will not know if nitrogen loss to 80 kg/ha/annum is attainable or appropriate.
52215	Te Taumutu Rūnanga	<a href="#">V1pLWRP-292</a>	11.4 Policies	Submitter supports general direction and key features of policies 11.4.21 to 11.4.28 but is concerned that more needs to be done to address over-allocation. The submitter identifies the Waiwhio/Irwell catchment as a sub-catchment where the feasibility and success of more immediate measures to address over-allocation can be implemented. This would mean: review of all water take consents in the sub-catchment, with the objective to return water to the waterway as per the recommended COMAR (Cultural Opportunities Mapping and Response) flow and; policy to enable a staged reduction [in allocation] similar to the framework for reducing on farm nitrogen losses.	Oppose in part	The Federation does not support setting of flows using COMAR as a primary technical tool.
52215	Te Taumutu Rūnanga	<a href="#">V1pLWRP-303</a>	11.5 Rules	Include new rule or addition to Schedule 7 that would require Farm Environment Plans (FEP) in the Cultural Landscape/Values Management Area to include details on how land use/farm practices recognise for and provide for 'living with a lake'. Te Taumutu Rūnanga would like to work with Environment Canterbury to	Support in part	The relief sought makes sense because it will result in the integration of various requirements relating to an increased level of care of the Te Waihora/Lake Ellesmere within relevant Farm Environmental Plans. The Federation considers that this approach will be a more effective and efficient method to achieve outcomes

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
				further develop Farm Environment Plan templates to ensure that these provide for Ngāi Tahu values and; develop a system whereby Te Taumutu Rūnanga is involved in the annual audit of Farm Environment Plans, particularly in the Cultural Landscape/Values Management Area.		required than other available options.
52215	Te Taumutu Rūnanga	<a href="#">V1pLWRP-304</a>	Schedule 7 – Farm Environment Plan	Include new rule or addition to Schedule 7 that would require Farm Environment Plans (FEP) in the Cultural Landscape/Values Management Area to include details on how land use/farm practices recognise for and provide for 'living with a lake'. Te Taumutu Rūnanga would like to work with Environment Canterbury to further develop Farm Environment Plan templates to ensure that these provide for Ngāi Tahu values and; develop a system whereby Te Taumutu Rūnanga is involved in the annual audit of Farm Environment Plans, particularly in the Cultural Landscape/Values Management Area.	Support in part	The relief sought makes sense because it will result in the integration of various requirements relating to an increased level of care of the Te Waihora/Lake Ellesmere within relevant Farm Environmental Plans. The Federation considers that this approach will be a more effective and efficient method to achieve outcomes required than other available options.
52215	Te Taumutu Rūnanga	<a href="#">V1pLWRP-305</a>	11.5.6	Include new rule or addition to Schedule 7 that would require Farm Environment Plans (FEP) in the Cultural Landscape/Values Management Area to include details on how land use/farm practices recognise for and provide for 'living with a lake'. Te Taumutu Rūnanga would like to work with Environment Canterbury to further develop Farm Environment Plan templates to ensure that these provide for Ngāi Tahu values; and develop a system whereby Te Taumutu Rūnanga is involved in the annual audit of Farm Environment Plans, particularly in the Cultural Landscape/Values Management Area.	Support in part	The relief sought makes sense because it will result in the integration of various requirements relating to an increased level of care of the Te Waihora/Lake Ellesmere within relevant Farm Environmental Plans. The Federation considers that this approach will be a more effective and efficient method to achieve outcomes required than other available options.
52215	Te Taumutu Rūnanga	<a href="#">V1pLWRP-306</a>	11.5.7	No specific decision requested. But Te Taumutu Rūnanga will accept an extension to the 1 July 2015 due date for Farm Environment Plans within the Cultural Landscape/Values Management Area in Rule	Support in part	The Federation agrees that it is unrealistic to achieve compliance by 1 July 2015. The recognition and support of Te Taumutu Rūnanga in this regard is appreciated.

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				11.5.7 Condition 4 given the timing of notification of Variation 1.		
52215	Te Taumutu Rūnanga	<a href="#">V1pLWRP-308</a>	11.5.19	No specific decision requested. Submitter seeks that stock access rules should be strengthened consistent with the policy position in the Mahaanui IMP 2013 of no stock access to waterways.	Support in part	<p>The Federation supports in principle the approach of full-time stock exclusion from surface water as an aspirational goal.</p> <p>Notwithstanding our support it is important to be mindful that requirements to exclude stock from all surface water are unworkable in the hill and high country environment due to very high cost and loss of ability to use land. For most hill and high country farming situations, the priority resource management issues are adverse effects of proliferation of plant and animal pests and soil erosion, not the effects of stock access to surface water.</p>
52215	Te Taumutu Rūnanga	<a href="#">V1pLWRP-318</a>	11.5.40	<p>Amend Rule 11.5.40 to include additional condition as follows:  <u>5. "The discharge is for the purpose of the restoration of flows for ecological and cultural purposes."</u>  Amend matters of discretion (5) as follows:  "Any adverse effects on water quality in the receiving aquifer or river, significant habitats of indigenous flora and fauna or sites <u>or values</u> of importance to Ngāi Tahu from moving water from one catchment or water body to another."</p>	Oppose in part	Any project to augment surface water or groundwater is likely to be very costly, accordingly the Federation considers that such a project is unlikely to occur unless as part of a commercial project or scheme.
52306	The Canterbury Farming Company	Entire submission	Entire submission		Support in part	For reasons given in the submission of Federated Farmers.
51972	The Fertiliser Association of	Entire submission	Entire submission		Support in part	The Federation by and large supports the relief sought by the submitter, because it aligns with the submission of Federated Farmers, or is in the interest of the wider

Sub ID	Submitter Name	Point ID	Plan Provision	Summary of Decision Requested	Support/ Oppose	Reason for submission
	New Zealand					community and the environment. Our reasons for support are as the reasons given by the submitter, or as provided for equivalent points raised in the submission and further submissions of Federated Farmers.  Matters of particular significance or interest, and that are <u>supported</u> , are identified in our further submissions on other parts of the submission of The Fertiliser Association of New Zealand.
51972	The Fertiliser Association of New Zealand	<a href="#">V1pLWRP-787</a>	11.4.1	Amend Policy 11.4.1 to refer to avoid, <u>remedy or mitigate</u> cumulative effects.	Support in part	It is not practical to avoid adverse effects on a shallow confined lake of the size and physical context of Te Waihora/Lake Ellesmere.
51972	The Fertiliser Association of New Zealand	<a href="#">V1pLWRP-788</a>	11.4.12	No specific decision requested. Submitter notes that the Policy captures sub-surface drains and that drains being caught by the rule should be sufficiently significant.	Support in part	Agree that subsurface drains should not be subject to setbacks or exclusions for cultivation, stock access, or intensive winter grazing. Recommend the inclusion of an effects-based standard for discharges from sub-surface drains.
51972	The Fertiliser Association of New Zealand	<a href="#">V1pLWRP-790</a>	11.1a	Amend definition of "Intensive winter grazing" to read: grazing of stock between 4 May and 30 September inclusive on fodder crops or pasture <del>where the grazing results in removal of, or damage to vegetation and exposes bare ground and/or pugging of the soil</del> to the extent that the grazing results in <u>significant de-vegetation. This is usually associated with break feeding behind temporary electric fencing</u> ".	Support in part	The conditions described in the definition of 'Intensive Winter Grazing' in the notified Variation will arise in virtually any stocking situation on land during the winter months. Refinement is required so that the definition actually reflects the activity that the Council seeks to control.
51972	The Fertiliser Association of New Zealand	<a href="#">V1pLWRP-796</a>	Schedule 24 – Farm Practices	Amend "and is reviewed annually" to read "and is reviewed triennially and after any significant farm system change".	Support in part	The relief sought will create efficiency with little or no reduction in effectiveness.

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52280	Trustpower Limited	<a href="#">V1pLWRP-986</a>	Table 11(e)	Delete reference to the Little Rakaia Combined Surface and Groundwater Allocation Zone from Table 11(e).	Oppose in part	Relief sought appears to result in a situation where there is no water allocation for the Little Rakaia Combined Surface and Groundwater Allocation Zone, which does not accord with the Variation, the pLWRP or superior legislation.
52280	Trustpower Limited	<a href="#">V1pLWRP-973</a>	Section 11 - Selwyn Waihora	Amend first paragraph of Section 11 as follows: "The area covered by this section is shown on the map below...This section does not set flow and allocation regimes for the Rakaia and Waimakariri Rivers. These are contained in the National Water Conservation Order (Rakaia River) <del>Amendment</del> Order 4998 <u>2013</u> and the Waimakariri River Regional Plan." Delete the requirements of the Little Rakaia Combined Surface and Groundwater Allocation Zone from Variation 1, as they relate to the establishment of allocation limits and rules regarding water takes from the Rakaia River. Specific relief in relation to this matter is also set out in the submission points that follow.	Oppose in part	Relief sought appears to result in a situation where there is no water allocation for the Little Rakaia Combined Surface and Groundwater Allocation Zone, which does not accord with the Variation, the pLWRP or superior legislation.
52253	Waihora Ellesmere Trust	<a href="#">V1pLWRP-325</a>	11.4.12	Amend 11.4.12(c) to change to 1 July 2016 from 1 July 2015.	Support in part	The July 2015 timeframe to prepare and implement Farm Environment Plans is unworkable.
52313	Whitefield Dairies Ltd & Nth Canterbury Federated Farmers	<a href="#">V1pLWRP-604</a>	11.5.18	No specific decision requested. Submitter seeks amendment to the LWRP Rule 5.70 to enable infrequent stock crossings.	Support in part	Infrequent stock crossings are required to access and make reasonable use of less well developed or less intensively farmed land.