

Gay Gibson

From: Lynette Wharfe <lynette@agribusinessgroup.co.nz>
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Subject: TRIM: Further submission on Var 1 to the pLWRP
Attachments: HNZ FS on Var 1 to pLWRP.pdf

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Please find attached on behalf of Horticulture NZ a Further submission on Variation 1 to the pLWRP.

Could you please acknowledge receipt of this submission.

Many thanks

Lynette

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Further Submission on Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan

(Closing date: Monday 9 June 2014)

To: Environment Canterbury
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Horticulture New Zealand

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Horticulture New Zealand represents horticultural growers in the Canterbury Region, so represents a relevant aspect of the public interest.

Horticulture New Zealand is not a trade competitor and would not gain any advantage through this further submission.

I do wish to be heard in support of my submission

If others make a similar submission, I **would not** be prepared to consider preparing a joint case with them at any hearing.

NOTE:

It is noted that Council is treating the submissions and further submissions to the LWRP as submissions and further submissions to this Variation. Horticulture NZ is concerned about the legality of this approach but will not advance this further at this stage. In terms of any issues of scope as the submissions and further submissions of Horticulture NZ to the LWRP are now treated as submissions and further submissions to the Variation then any issues arising are covered in that suite of submissions. Therefore Horticulture NZ does not intend to lodge any further submissions to that suite of submissions which will simply duplicate what has already been done.



.....
Signature of person making submission or person authorised to sign on behalf of person making submission.

Date: 9 June 2014

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Ellesmere Irrigation Society Inc	52210	V1pLWRP-464	Amend Section 11 to include the following sentence at the end of the sixth paragraph on page 4-3: "It is also recognised that this improvement will take time beyond the life of this Plan".	Support	Improvement to the health of Te Waihora/ Lake Ellesmere and water bodies requires an intergenerational response with realistic and achievable targets.
Beef +Lamb New Zealand	52292	V1pLWRP-568	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	Maintenance of the nationally significant land based economy in the catchment must be an explicit objective to achieve the overall vision for the Te Waihora catchment and is consistent with the ZIP Addendum.
Beef +Lamb New Zealand	52292	V1pLWRP-570	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	Maintenance of the nationally significant land based economy in the catchment must be an explicit objective to achieve the overall vision for the Te Waihora catchment and is consistent with the ZIP Addendum.
Beef +Lamb New Zealand	52292	V1pLWRP-577	Amend the grandfathering approach of Variation 1 to provide for a period of transition to an equitable, more flexible approach of setting maximum permitted contaminant discharges such as any of the options set out in Option 3 in the s.32 report.	Support in Part	Support in part to the extent that: <ol style="list-style-type: none"> 1. A more equitable intergenerational approach is required to nutrient management. 2. The section 32 analysis does not contain a level of detail that corresponds to the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the plan change.
Ravensdown Fertiliser Co-operative Limited	52249	V1pLWRP-803	Submitter seeks that Council withdraw Variation 1, until such a time as the Matrix of Good Management Project numbers are available and re-notifying the Variation at this point.	Support	Hort NZ are co-funders of work on the Matrix of Good Management (MGM) project that is part of our broader environmental management programme. The work is not yet complete. Currently we are unable to determine what the full effect of setting a limit will be,

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					in the absence of not understanding what farms can achieve under good management practice.
Ravensdown Fertiliser Co-operative Limited	52249	V1pLWRP-806	Submitter seeks that Council clarify its intention to rely on Good Management Practice loss rate calculations as the means to achieve the water quality outcomes sought	Support	Good Management Practice Nitrogen and Phosphorous Loss Rates (GMPNPLR) are yet to be developed so the effect of this policy and methods cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertaken and be inserted into the plan through a 1 st schedule process.
Ravensdown Fertiliser Co-operative Limited	52249	V1pLWRP-828	Delete the reference to Good Management Practice Nitrogen and Phosphorus Loss Rates (as discussed in the 'General Matters' section above) until the Matrix of Good Management Project is completed, and adoption of an approach consistent with the findings of the s.32 Report.	Support	Good Management Practice Nitrogen and Phosphorous Loss Rates (GMPNPLR) are yet to be developed so the effect of this policy and methods cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertaken and be inserted into the plan through a 1 st schedule process.
Proposed Variation 1 to the Proposed Canterbury Land and Water Regional Plan	52307	V1pLWRP-733	Submitter questions how Canterbury Regional Council will deal with change to OVERSEER [®] estimates for both phosphorus and nitrogen, with different versions of OVERSEER, and questions ability of all parties to manage under the tools available.	Support in Part	The plan change must have a clear and consistent approach to addressing changes to versions of Overseer and impacts on policy and methods and provide for other tools where Overseer is not appropriate.
Dairy NZ	52271	V1pLWRP-1352	Submitter seeks the inclusion of a method to develop a mechanism that provides for the transfer of nitrogen loss rates, which enables flexibility.	Support in Part	Support in part to the extent that there is a need to assess alternative methods to achieve nutrient management outcomes.
Dairy NZ	52271	V1pLWRP-1377	Ensure the Variation includes appropriate linkages between [freshwater] outcomes and non- regulatory methods and	Support in Part	Support in part to the extent that there is a need to assess alternative methods to achieve water management outcomes.

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			acknowledges the role and importance of non-regulatory methods generally		
Fonterra Co-operative Group Limited	52333	V1pLWRP-1579	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	Support in part to the extent that there is a need to assess alternative methods to achieve nutrient management outcomes. Hort NZ seeks a permitted or controlled activity transfer rule to be overseen by Council to provide for transfer of nutrients within or between properties within the water management unit where it can be demonstrated that transfer will not cause an increase that exceeds the provision for the total nutrient load limit for the water management unit.
Nga Rūnanga and Te Rūnanga O Ngāi Tahu	52233	V1pLWRP-365	Include a new objective: <u>To restore the mauri of Te Waihora while maintaining the prosperous land-based economy and thriving communities.</u>	Support	Maintenance of the nationally significant land based economy in the catchment must be an explicit objective to achieve the overall vision for the Te Waihora catchment and is consistent with the Zip Addendum.
Central Plains Water Ltd	52239	V1pLWRP-345	Amend Section 11 as follows: The area covered by this section is shown on the map below. It includes the foothills catchment of the Waikirikiri/Selwyn River and its tributaries, the plains between the Waimakariri and Rakaia Rivers, the Selwyn and Halswell River/Hurutini, and a number of other lowland streams and ephemeral waterways of Banks Peninsula that flow into Te Waihora/Lake Ellesmere. Te Waihora/Lake Ellesmere is central to Ngāi Tahu values and culture. 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) Order 1998 and the Waimakariri River Regional Plan.	Support in Part	Support in part to the extent that other values must be explicitly stated. In particular there needs to be a value relating to food production and the importance to the social and economic wellbeing of the community. Support in part to the extent that it is not clear what the variation is intended to achieve. From one perspective the variation appears to seek a reduction in contaminants including nutrients generated from land-use activities to meet new load limits specified for waterbodies.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p>[map]</p> <p>The Selwyn-Waihora area that is addressed by this section includes a diverse range of farming, industrial and township based activities. The area is of significant economic, social and cultural importance to the wider Canterbury Region and New Zealand. The following sustainable water management priority outcomes have been identified by the Selwyn-Waihora Zone Committee:</p> <ul style="list-style-type: none"> • Thriving communities and sustainable economies. • High quality and secure supplies of drinking water. • Good practice nutrient and water management. • Kaitiakitanga is integrated into water management in the Zone. • Healthy lowland streams. • Te Waihora is a healthy ecosystem. • Hill fed waterways support aquatic life and recreation. • Alpine rivers and high country values are protected. • Enhanced Indigenous Biodiversity across the Zone. <p>Te Waihora/Lake Ellesmere is a tribal taonga for Ngāi Tahu. It has long been an abundant source of mahinga kai and is also known by the name Te Kete Ika a Rākaihautū, the fish basket of Rākaihautū. The outstanding cultural significance of Te Waihora/Lake Ellesmere is recognised in the Ngāi Tahu Claims Settlement Act 1998 and the National Water Conservation (Te Waihora/Lake Ellesmere) Order 1990. Under the Ngāi Tahu Claims Settlement Act 1998, ownership of the lakebed of Te Waihora/Lake Ellesmere was returned to Te Rūnanga o Ngāi Tahu.</p>		<p>On the other hand, the variation is seeking to provide for a significant area of new irrigation and intensification.</p> <p>There is an inherent tension between the two. The Variation needs to provide for land use in the whole catchment, whether in or out of the new irrigation area.</p> <p>It seems that landowners and land users in other parts of the water management unit are being compromised in terms of their opportunity cost, direct effects on their capital land values, reductions in the flexibility of the land use options, to enable the new development.</p> <p>An outcome sought by Hort NZ is for Council to consider withdrawing parts of the Variation that do not relate to Community Irrigation Schemes or that the whole catchment is looked at in totality.</p>

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			<p>Te Waihora/Lake Ellesmere is also recognised as a nationally significant wetland for both wildlife and wildlife viewing. It supports a rich biological environment including native and introduced species. It is regarded as an important recreational resource for New Zealanders. It is used for fishing, kayaking, motor boating, wind surfing, water and jet skiing, duck shooting, picnicking, bird watching and sightseeing.</p> <p><u>Irrigation is critical to delivering a wide range of benefits at local, regional and national scales.</u></p> <p>In the last 20 years, water use, irrigation and intensive land use have increased substantially. Further irrigation development has been consented, <u>and the implementation of this irrigation is anticipated by this section of the plan. In the future, it is possible that further storage will be required to offset the effects of low reliability and increased minimum flows.</u></p> <p><u>Although</u> flows in lowland streams and the Selwyn River/Waikirikiri have decreased by 15-20%, <u>there is potential for flows to improve following the implementation of consented irrigation.</u></p> <p><u>Against the above,</u> there are elevated nitrate concentrations in shallow groundwater and lowland streams, and the health of Te Waihora/Lake Ellesmere has deteriorated.</p> <p><u>There is a lag effect in the transport of nitrogen in the groundwater system of 10-30 years so some environmental and cultural health outcomes will continue to decline even with immediate action.</u></p> <p>Phosphorus from historical land use has <u>also</u> accumulated</p>		

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			<p>in the lakebed sediments of Te Waihora/Lake Ellesmere and is released into the lake when wind-induced wave action disturbs the lake sediments. This can give rise to algal blooms that impact on cultural, recreational and amenity values associated with the lake.</p> <p>The overall vision for Te Waihora/Lake Ellesmere catchment is 'to restore the mauri of Te Waihora while maintaining <u>promoting</u> the prosperous land-based economy and thriving communities.'</p> <p>Achieving the vision for Te Waihora/Lake Ellesmere and its catchment will require a sustained effort over a long period of time. A package of actions to achieve the vision for the Selwyn-Waihora catchment has been identified through a two year collaborative planning process with the Selwyn-Waihora Zone Committee. The Selwyn-Waihora Zone Implementation Programme Addendum 2013 records the full package of actions to be implemented. This sub-regional section comprises the regulatory actions.</p> <p>The key resulting actions included in the package are:</p> <ul style="list-style-type: none"> • Consented alpine water introduced to the catchment for additional irrigation development and is also used to replace groundwater takes, enable stream augmentation and/or managed aquifer recharge; • Water allocation limits, to deliver ecological and cultural flows; • New takes in over-allocated water management zones are prohibited and the volume of water allocated is reduced; • Reducing legacy phosphorus in Te Waihora/Lake 		

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			<p>Ellesmere by 50 percent and improved management of lake-level and opening;</p> <ul style="list-style-type: none"> Restricting the agricultural nitrogen load losses from the catchment; A 50 percent reduction in the catchment phosphorus load; Requiring all farming activities to operate with <u>at good management practice s then make further improvements over time in managing nitrogen.</u> 		
Selwyn District Council	52245	V1pLWRP-513	<p>Amend Section 11 - Selwyn-Waihora Page 4-1 with the addition of the following:</p> <p>"Freshwater is an essential natural resource, having a range of values. Water and the associated infrastructure are essential to provide for economic, social, cultural and environmental wellbeing. Within the Selwyn-Waihora area there are a number of existing towns and communities. The continuing functioning of these areas is important to ensuring the overall social and economic wellbeing of the area. In addition within the area there are a range of primary production and other business activities where their continued operation is important in ensuring the sustainable management of natural and physical resources</p>	Support in Part	Support in part to the extent that other values must be explicitly stated. In particular there needs to be a value relating to food production and the importance to the social and economic wellbeing of the community.
Selwyn District Council	52245	V1pLWRP-512	<p>Amend page 3-2 to read:</p> <p>"When groundwater levels fall below the specified water levels in the nominated monitoring bores, the following reductions in the volume of water available for abstraction are to be applied to groundwater abstractions in the West Melton Special Zone. The restrictions do not apply to takes</p>	Oppose in part	There needs to be the potential for restrictions in community water supplies if groundwater levels fall below specified limits.

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			less than 10 m3 <u>permitted under this Plan and to</u> takes for community water supply <u>permitted under this Plan</u> ".		
North Canterbury Province of Federated Farmers NZ Inc	52318	V1pLWRP-846	Amend the introduction to include a catchment objective that reads: <u>"The mauri of Te Waihora and its tributaries is restored, while maintaining a prosperous land-based economy and thriving communities in the Selwyn-Te Waihora catchment."</u>	Support	Maintenance of the nationally significant land based economy in the catchment must be an explicit objective to achieve the overall vision for the Te Waihora catchment and is consistent with the ZIP Addendum and is consistent with the ZIP Addendum.
KO Farm Ltd	52332	V1pLWRP-988	Amend introductory text to Section 11 and associated policies, to fully identify all potential issues associated with the proposed nutrient management regime, including the social and economic issues that may be associated with achieving the vision for Te Waihora/Lake Ellesmere including: (i) potential impacts on farm viability/profitability; (ii)) social and economic consequences of the failure to obtain resource consents that may be necessary to continue an existing farming operation; (iii) lack of opportunities to undertake new land use options for landholdings; and impact on value of existing landholdings.	Support in Part	Support to the extent that in our view, the section 32 analysis does not contain the level of detail that corresponds to the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the variation. There has not been an appropriate analysis of the economic growth that is anticipated to be provided or reduced and the employment that is anticipated to be provided or reduced by the proposal. Additionally, the risk of acting by initiating the variation has not been accurately assessed.
Dairy NZ	52271	V1pLWRP-1343	Amend by introducing the additional underlined text to the introductory narrative (paragraph 9). The package is significant but it will not achieve the catchment vision. Modelling indicates that to achieve the full vision for the lake under current land management techniques would require wholesale changes in land use in the catchment which would not enable people and communities to provide for their economic and social well-being.	Support	Values relating to food production and the importance to the social and economic wellbeing of the community must be explicitly identified in the plan. Nutrient and water management outcomes sought are intergenerational and regulatory methods must support realistic and achievable targets.

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			<p><u>The catchments of Te Waihora/Lake Ellesmere are intensively used for primary production including, in particular, food production - much of it for export to foreign markets. Substantial food production and food-processing infrastructure (including modern, international-scale facilities) has developed over recent decades and dominates the local economy. Accordingly, many of the communities of the catchment are reliant on the continuation of irrigated agriculture and associated processing for their continued social and economic well-being.</u></p> <p><u>Thus, the transition to meeting the full vision for the lake must be designed and paced to enable progress at the same time as the continuation of a viable agricultural sector. Innovation in agriculture is expected to enable producers to further improve management of irrigation and diffuse pollution but it is important to match any new regulatory impositions with the availability and viability of these improved management practices. While some are available and should be employed now (and are included in this Section of the Plan), others may be some years away. Accordingly, it will be important to ensure that limits and associated practice and technological requirements and expectations are imposed with a degree of flexibility and kept under regular review. This sub-regional section includes policies and rules...</u></p>		
Fonterra Co-operative Group Limited	52333	V1pLWRP-1213	<p>Amend Introductory text as follows: The package is significant but it will not achieve the catchment vision. Modelling indicates that to achieve the full vision for the lake under current land management techniques would require wholesale changes in land use in the catchment which would not enable people and</p>	Support	Values relating to food production and the importance to the social and economic wellbeing of the community must be explicitly identified in the plan.

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			<p>communities to provide for their economic and social well-being.</p> <p><u>The catchments of Te Waihora/Lake Ellesmere are intensively used for primary production including, in particular, food production. A substantial food production and food-processing infrastructure (including modern, international-scale facilities) has developed over recent decades and is a significant contributor to the local economy. Accordingly, many of the communities of the catchment are reliant on the continuation of intensive agriculture and associated processing for their continued economic and social health and well-being.</u></p> <p><u>Thus, the transition to meeting the full vision for the lake must be designed and paced to enable environmental improvement at the same time as the continuation of a viable agricultural sector. Innovation in agriculture is expected to enable producers to further improve management of irrigation and diffuse pollution but it is important to match any new regulatory impositions with the availability and viability of these improved management practices. While some are available and should be employed now (and are included in this Section of the Plan), others may be some years away. Accordingly, it will be important to ensure that limits and associated practice and technological requirements and expectations are imposed with a degree of flexibility and kept under regular review.</u> This sub-regional section includes policies and rules ...</p>		Nutrient and water management outcomes sought are intergenerational and regulatory methods must support realistic and achievable targets.
The Canterbury Farming Company	52306	V1pLWRP-1618	Amend the introduction to include a catchment objective that reads:	Support	Maintenance of the nationally significant land based economy in the catchment must be an explicit objective to achieve the overall vision for the Te

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			<u>"The mauri of Te Waihora and its tributaries is restored, while maintaining a prosperous land-based economy and thriving communities in the Selwyn-Te Waihora catchment."</u>		Waihora catchment and consistent with the ZIP Addendum.
Ellesmere Irrigation Society Inc	52210	V1pLWRP-465	Delete definition 'Baseline Land Use'. Submitter states it is inappropriate to use a baseline approach that pre-dates the plan provisions and restricts future land uses.	Support	There needs to be provision for flexibility in land use.
Ellesmere Irrigation Society Inc	52210	V1pLWRP-466	Delete definition of 'Cultivation' as there are no policies or rules relating to cultivation.	Support in Part	<p>The term cultivation appears in Schedule 24 to define where a vegetation strip is to occur when cultivation occurs adjacent various waterbodies or wetland.</p> <p>In the rural environment vegetation cover can avoid, remedy or mitigate adverse effects from rural production. However rural production activities require the ability to manage vegetation species and growth to ensure production activities are not compromised. Unmanaged vegetation can cause root intrusion or overhang of productive land as well as adverse shading effects, infrastructure (tracks, pipes, buildings) disruption and harbour pests and diseases. Biosecurity tree works may also include vegetation removal.</p> <p>The provision and use of a definition of cultivation in the plan must recognise that the vegetation buffer is not static but is required to be managed to achieve the environmental outcomes sought and maintain rural production.</p>
Beef +Lamb New Zealand	52292	V1pLWRP-572	Amend definition of 'Nitrogen Baseline' to read: (a) The mean maximum discharge of nitrogen below the	Support in Part /	The plan change must have a clear and consistent approach to addressing changes to versions of Overseer and impacts on policy and methods.

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			root zone in any one year, as modelled with OVERSEER [®] , 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;	Oppose in Part	
The Canterbury Farming Company	52306	V1pLWRP-566	Amend definition of 'Nitrogen Baseline' so that the figure is the maximum nitrogen loss over the 2009 to 2013 period. [A decision is yet to be made by the Hearing Commissioners on whether this is a valid submission point.]	Support	The nitrogen baseline should be based on the highest number of the rotation, not a rolling average that does not reflect typical horticultural operations including rotational cropping.
North Canterbury Province of Federated Farmers NZ Inc	52318	V1pLWRP-862	Amend to include a definition of 'Nitrogen Baseline' to section 11.1.A that reads: <u>" Nitrogen Baseline Selwyn-Te Waihora Section... means any one of the following calculations:</u> (a) The mean maximum discharge of nitrogen below the root zone <u>in any one year</u> , as modelled with OVERSEER [®] , 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; <u>or</u> (b) <u>in the case where a resource consent has been granted to take or use water or discharge dairy shed effluent in the period 01 July 2009 – 30 June 2013, and that resource consent specifies a condition relating to the use of the water or a nitrogen discharge allowance, the calculation will be on the basis of that condition; or</u>	Support	The plan change must have a clear and consistent approach to addressing changes to versions of Overseer and impacts on policy and methods.

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			<p>(c) <u>A nitrogen baseline for the property which is approved by the Chief Executive Officer of Environment Canterbury as a fair representation of the potential land use on the property as at 01 January 2014 considering where the property was dryland or irrigated and, if irrigated, the volume of water allocated and the purpose for which any water permit had been issued.</u></p> <p>(d) If OVERSEER[®] is updated and a new nitrogen baseline is required 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>		
North Canterbury Province of Federated Farmers NZ Inc	52318	V1pLWRP-875	<p>Amend to include a definition of 'Farm Enterprise' to section 11.1A which reads:</p> <p><u>"means areas of land whether held in single or multiple ownership and whether adjoining or separated, which are farmed as a single operating unit for the purpose of nutrient management."</u></p>	Support in part	All land managed as part of an operation should be included as a 'farm enterprise'.
Irrigation New Zealand Inc	52278	V1pLWRP-1056	<p>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':</p> <p>"the maximum discharge of nitrogen approved by the Chief Executive of Environment Canterbury, averaged over the period of 01 July 2009-30 June 2013,...."</p>	Support	The nitrogen baseline should be based on the highest number of the rotation, not a rolling average that does not reflect typical horticultural operations including rotational cropping.
Synlait Farms Ltd	52287	V1pLWRP-1227	<p>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:</p> <p>The nitrogen loss calculation; or</p>	Support in Part	The nitrogen baseline should be based on the highest number of the rotation, not a rolling average that does not reflect typical horticultural operations including rotational cropping.

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			The annual discharge of nitrogen below the root zone utilising the highest given loss over the previous four years.		
Dairy NZ	52271	V1pLWRP-1516	<p>Amend to include a definition of "Selwyn-Waihora Nitrogen Baseline" as follows: "(a) the discharge of nitrogen below the root zone, as modelled with OVERSEER[®] 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 (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</p> <p>If OVERSEER[®] is updated, the most recent version is to be used to recalculate the nitrogen baseline using the same input data as <u>was used for the original baseline determination.</u>"</p>	Support in Part / Oppose in Part	The plan change must have a clear and consistent approach to addressing changes to versions of Overseer and impacts on policy and methods.
The Canterbury Farming Company	52306	V1pLWRP-1649	<p>Amend to include a definition of 'Nitrogen Baseline' to section 11.1.A that reads: "<u>Nitrogen Baseline Selwyn-Te Waihora Section...</u> means any one of the following calculations: (a)) The mean-maximum discharge of nitrogen below the</p>	Support in Part	The nitrogen baseline should be based on the highest number of the rotation, not a rolling average that does not reflect typical horticultural operations including rotational cropping.

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			<p>root zone <u>in any one year</u>, as modelled with OVERSEER[®], 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; <u>or</u></p> <p>(b) <u>in the case where a resource consent has been granted to take or use water or discharge dairy shed effluent in the period 01 July 2009 – 30 June 2013, and that resource consent specifies a condition relating to the use of the water or a nitrogen discharge allowance, the calculation will be on the basis of that condition; or</u></p> <p>(c) <u>A nitrogen baseline for the property which is approved by the Chief Executive Officer of Environment Canterbury as a fair representation of the potential land use on the property as at 01 January 2014 considering where the property was dryland or irrigated and, if irrigated, the volume of water allocated and the purpose for which any water permit had been issued.</u></p> <p>(d) If OVERSEER[®] is updated and a new nitrogen baseline is required 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>		The plan change must have a clear and consistent approach to addressing changes to versions of Overseer and impacts on policy and methods.
Canterbury Grasslands Group	52314	V1pLWRP-1422	Amend 'Baseline Land Use' to be the highest out of the previous 4 years.	Support	The nitrogen baseline should be based on the highest number of the rotation, not a rolling average that does not reflect typical horticultural operations including rotational cropping.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Fonterra Co-operative Group Limited	52333	V1pLWRP-1573	<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[®] 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,</u></p> <p><u>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[®] 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></p>	Support in Part	<p>The nitrogen baseline should be based on the highest number of the rotation, not a rolling average that does not reflect typical horticultural operations including rotational cropping.</p> <p>The plan change must have a clear and consistent approach to addressing changes to versions of Overseer and impacts on policy and methods.</p>
Fonterra Co-operative Group Limited	52333	V1pLWRP-1574	<p>Define "Selwyn-Waihora Nitrogen Loss Calculation" as follows:</p> <p><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</u></p>	Support in Part	<p>The nitrogen baseline should be based on the highest number of the rotation, not a rolling average that does not reflect typical horticultural operations including rotational cropping.</p>

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p><u>Calculation for that property:</u> <u>a. the discharge of nitrogen below the root zone modelled in accordance with the definition of "Nitrogen Loss Calculation"; or</u> <u>b. the discharge of nitrogen below the root zone for:</u> <u>i. the most recent year; or</u> <u>ii. the average over two, three or four consecutive years (including the most recent year).</u> Expressed in kg per hectare per year, as modelled with OVERSEER[®] or equivalent model approved by the Chief Executive of <u>Environment Canterbury</u>. If OVERSEER[®] is updated the most recent version is to be used</p>		The plan change must have a clear and consistent approach to addressing changes to versions of Overseer and impacts on policy and methods.
Mr and Mrs Alistair and Sharon Rayne	52668	V1pLWRP-1423	Amend 'Baseline Land Use' to be the highest out of the previous 4 years.	Support	The nitrogen baseline should be based on the highest number of the rotation, not a rolling average that does not reflect typical horticultural operations including rotational cropping
Nga Runanga and Te Runanga O Ngai Tahu	52233	V1pLWRP-370	Amend to replace Policies 11.4.6 to 11.4.17 with the following: (Change sought not included in this FS – refer Summary of submissions)	Support in part	The submitter seeks an alternative approach to the policies to manage Te Waihora/ Lake Ellsemere catchment. Horticulture NZ seeks to ensure that all land uses are adequately provided for in the policy provisions of the Variation.
Nga Runanga and Te Runanga O Ngai Tahu	52233	V1pLWRP-401	Amend to replace Policies 11.4.21 to 11.4.32 with the following: (Change sought not included in this FS – refer Summary of submissions)	Support in part	The submitter seeks an alternative approach to the policies to manage Te Waihora/ Lake Ellsemere catchment. Horticulture NZ seeks to ensure that all land uses are adequately provided for in the policy provisions of the Variation.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Beef +Lamb New Zealand	52292	V1pLWRP-571	Amend policies to provide a more consistent and equitable approach to managing the discharge of contaminant nitrogen to water, that does not restrict land use change or change land value on the basis of current use.	Support in Part	Support in part to the extent that there is a need to assess alternative methods to achieve nutrient management outcomes.
Beef +Lamb New Zealand	52292	V1pLWRP-574	Amend the policies of Variation 1, to provide for a more equitable and sustainable approach to nitrogen loss within the catchment.	Support in Part	Support in part to the extent that there is a need to assess alternative methods to achieve nutrient management outcomes.
Ravensdown Fertiliser Co-operative Limited	52249	V1pLWRP-804	Submitter seeks to amend the policies to include a policy outlining that Council will introduce into the pLWRP by Variation or Plan Change the Matrix of Good Management numbers for the primary sectors once available in mid- 2015. (To be included if the submission on the Variation as a whole is not accepted).	Support in Part	Good Management Practice Nitrogen and Phosphorous Loss Rates (GMPNPLR) are yet to be developed so the effect of this policy and methods cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertake and be inserted into the plan through a 1 st schedule process.
Ballance Agri-Nutrients Limited	52309	V1pLWRP-783	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	Support in Part	Support in part to the extent that there is a need to assess alternative methods t to further guide good management practice for phosphorus and sediment loss. Good Management Practice Nitrogen and Phosphorous Loss Rates (GMPNPLR) are yet to be developed so the effect of this policy and methods cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertake and be inserted into the plan through a 1 st schedule process.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			pLWRP by way of a Variation or Plan Change in accordance with Schedule 1 of the RMA."		
Fish and Game Council North Canterbury	52310	V1pLWRP-661	Amend to include a new policy as follows: <u>"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"</u> .	Oppose in part	All values need to be recognised in the Variation including food production.
Fonterra Co-operative Group Limited	52333	V1pLWRP-1305	Amend to include a new policy limiting the granting of non-complying activities for nitrogen loss that exceeds the nitrogen baseline to exceptional cases. 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.	Support	Rule 11.5.12 is a prohibited activity rule if the nitrogen loss calculation is increased over the nitrogen baseline. It is considered that Rule 11.5.12 should be non-complying to allow consideration given the uncertainties with establishing the nutrient baseline and the methodology on which it is based. A non-complying rule allows for consideration of an application where a land user can demonstrate the effects of the activity.
Central Plains Water Ltd	52239	V1pLWRP-354	Amend Policy 11.4.1 to read: Manage water abstraction and discharges of contaminants within the entire Selwyn-Waihora catchment to avoid, <u>remedy or mitigate</u> cumulative effects on the water quality of Te Waihora/Lake Ellesmere and flow of water in springs and tributaries flowing into Te Waihora/Lake Ellesmere.	Support	The three mechanisms to address adverse effects must be supported by the policy.
Selwyn District Council	52245	V1pLWRP-515	Amend Policy 11.4.1 to read: "..... catchment to <u>manage, and if practicable avoid adverse</u> cumulative effects on water quality	Support in Part	The three mechanisms (avoid, remedy or mitigate) to address adverse effects must be supported by the policy.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
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The Fertiliser Association of New Zealand	51972	V1pLWRP-787	Amend Policy 11.4.1 to refer to avoid, <u>remedy or mitigate</u> cumulative effects.	Support	The three mechanisms to address adverse effects must be supported by the policy.
Ellesmere Irrigation Society Inc	52210	V1pLWRP-472	Amend Policy 11.4.6 to read: "Reduce Limit the total nitrogen load entering Te Waihora/Lake Ellesmere by restricting minimising the losses of nitrogen from farming activities, industrial and trade processes and community sewerage systems. in accordance with the target (the limit to be met over time) and limits in Table 11(i). "	Support	Policy 11.4.6 seeks to limit the total nitrogen load in accordance with the figures in Table 11 (i), with the target for farming to be 4830 tonnes/year to be met by not later than 2037. Horticulture NZ is concerned at the methodology that has led to the figure of 4830t, the timeframe for it to be implemented and how it will be determined at a farm level without severely impacting on growers operations and the production of food.
Dairy NZ	52271	V1pLWRP-1345	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	There needs to be scope to revise the figures in Table 11 (i) as models are refined and more certain data produced.
Fonterra Co-operative Group Limited	52333	V1pLWRP-1218	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	There needs to be scope to revise the figures in Table 11 (i) as models are refined and more certain data produced.
Canterbury Grasslands Group	52314	V1pLWRP-1459	No specific decision requested. Submitter seeks any nitrogen loss reduction to be phased in over a period of at least 25 years.	Support in Part	The intergenerational nature of nutrient management is to be addressed by setting longer timeframes for transition to managing within the new limit that is set. We consider it may be necessary to transition to a more desirable state over a longer and perhaps an intergenerational timeframe with staged review.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Ellesmere Transport	52670	V1pLWRP-1463	No specific decision requested. Submitter seeks any nitrogen loss reduction to be phased in over a period of at least 25 years	Support in Part	The intergenerational nature of nutrient management is to be addressed by setting longer timeframes for transition to managing within the new limit that is set. We consider it may be necessary to transition to a more desirable state over a longer and perhaps an intergenerational timeframe with staged review.
Central Plains Water Ltd	52239	V1pLWRP-355	Amend Policy 11.4.12 paragraph one to read: "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 to:...</u> "	Oppose in part	There needs to be clarity and equity as to how the land uses in the catchment will be managed.
North Canterbury Province of Federated Farmers NZ Inc	52318	V1pLWRP-847	Delete Policy 11.4.12 and replace with the following: <u>Policy 11.4.12</u> <u>Reduce the discharge of nitrogen, sediment, phosphorous and microbial contaminants from farming activities into the catchment by:</u> <u>(a)Excluding intensively farmed livestock from all waterways and avoid the standing of cattle, pigs or deer in any waterway except for those parts of the catchment shown as hill and high country on Planning Map X.</u> <u>(b)Providing setbacks for grazing and cultivation from waterways and where appropriate riparian planting.</u> <u>(c) Requiring all farming practices to implement the good management practices listed in Schedule 24 to minimize the discharge of contaminants to water;</u> <u>(d) Avoiding any increase in nitrogen-nitrate loss from any property or farm enterprise if the estimated nitrogen</u>	Support in part	There needs to be consideration of a range of mechanism to achieve the objectives in the Plan.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<u>loss</u> using OVERSEER® is greater than 15kg per hectare per annum ; and Requiring those properties or farm enterprises with nitrogen-nitrates losses which are estimated using OVERSEER® to exceed <u>15kg per hectare per annum to manage their nitrogen-nitrate losses in accordance with Policy 11.4.13.</u>		
Fonterra Co-operative Group Limited	52333	V1pLWRP-1575	Amend Policy 11.4.12(a) as follows: (a) Not exceed the nitrogen baseline <u>Selwyn-Waihora Nitrogen Baseline</u> where a property's nitrogen loss calculation <u>Selwyn- Waihora Nitrogen Loss Calculation</u> is more than 15 kg of nitrogen per hectare per annum; and <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 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.		There needs to be scope to revise the figures in Table 11 (i) as models are refined and more certain data produced. Additional methods should be included in the Plan.
Synlait Farms Ltd	52287	V1pLWRP-1029	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	The use of other methods in the Plan to achieve the Plan's objectives is supported and should be included.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Dairy Holdings Ltd	53683	V1pLWRP-1938	<p>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:</p> <p>(a) Not exceed the nitrogen baseline where a property's nitrogen loss calculation is more than 15 kg of nitrogen per hectare per annum <u>unless provided for by a nutrient management group established in accordance with Rule 11.5.10A</u>; and</p>	Support in Part/ Oppose in Part	<p>Support in Part/Oppose in part to the extent that it is Hort NZ's opinion that it is not clear what the variation is intended to achieve. From one perspective the variation appears to seek a reduction in contaminants including nutrients generated from land-use activities to meet new load limits specified for waterbodies.</p> <p>On the other hand, the variation is seeking to provide for a significant area of new irrigation and Intensification.</p> <p>Support in part to the extent that other values must be explicitly stated. In particular there needs to be a value relating to food production and the importance to the social and economic wellbeing of the community.</p> <p>An outcome sought by Hort NZ is for Council to consider withdrawing parts of the Variation that do not relate to Community Irrigation Schemes or that the whole catchment is looked at in totality.</p>
Central Plains Water Ltd	52239	V1pLWRP-366	Delete policy 11.4.13 and include a method requiring the Council to commit to the development of the Good Management Practice Nitrogen and Phosphorous Loss Rates for inclusion in a subsequent notified plan variation (with an expectation that those rates will be complied with from 2017).	Support	The GMPNPLR are yet to be developed so the effect of this policy cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertaken and be inserted into the Plan through a First Schedule process.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
					The policy should be amended to only require the preparation of a Farm Environment Plans from 2017.
North Canterbury Province of Federated Farmers NZ Inc	52318	V1pLWRP-848	<p><u>Delete Policy 11.4.13 and replace with the following:</u> <u>By 01 July 2016 include by way of a plan change a schedule of maximum nitrogen loss rates for farm activities on soil types within the catchment, which properties or farm enterprises must comply with by 2022;</u> <u>or</u> <u>If no such schedule exists then from 01 July 2017 limit the loss of nitrogen-nitrates from farming activities which are estimated using OVERSEER® to exceed 15kg per hectare per annum or 20kg per hectare per annum on areas shown on Planning Map XX as light or very light soils in the following way:</u> <u>(i) Avoid any increase in estimated nitrogen loss from any property or farm enterprise where estimated nitrogen loss using OVERSEER® is greater than 15kg per hectare per annum or 20kg per hectare per annum in areas shown on Planning Map XX as light or very light soils;</u> <u>(ii)) Require properties or farm enterprises where nitrogen loss is estimated using OVERSEER® to exceed 15kg per hectare per annum or 20kg per hectare per annum in areas shown on Planning Map XX as light or very light soils, to develop and implement a nitrogen reduction plan using Best Practicable Options to reduce their nitrogen losses; and</u> <u>By 2037, avoid any property or farm enterprise having nitrogen losses estimated using OVERSEER® which exceeds 80kg per hectare per annum.</u></p>	Support in Part	<p>The GMPNPLR are yet to be developed so the effect of this policy cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertaken and be inserted into the Plan through a First Schedule process.</p> <p>The policy should be amended to only require the preparation of a Farm Environment Plans from 2017.</p>

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Mr Dougal Smith	52195	V1pLWRP-1107	Amend Policy 11.4.13 Clarify Good Management Practice Nitrogen Loss in tables detailing losses per soil type and land use activity. The plan cannot be supported if the nitrogen loss rates in policies 11.4.13 and 11.4.14 are unknown.	Support in Part	The GMPNPLR are yet to be developed so the effect of this policy cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertaken and be inserted into the Plan through a First Schedule process. The policy should be amended to only require the preparation of a Farm Environment Plans from 2017.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1273	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.	Oppose	The intergenerational nature of nutrient management is to be addressed by setting longer timeframes for transition to managing within the new limit that is set. We consider it may be necessary to transition to a more desirable state over a longer and perhaps an intergenerational timeframe with staged review.
Dairy NZ	52271	V1pLWRP-1350	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	Support	The GMPNPLR are yet to be developed so the effect of this policy cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertaken and be inserted into the Plan through a First Schedule process. The policy should be amended to only require the preparation of a Farm Environment Plans from 2017.
Mr and Mrs Frank and Robyn Lamborn	52275	V1pLWRP-1128	Retain use of Farm Environment Plans in clause (a) of Policy 11.4.13. Amend clause (b) in Policy 11.4.13 so there is a definition of what is expected of farmers or clearer reference to where	Support	The GMPNPLR are yet to be developed so the effect of this policy cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			this information about 'Good Management Practice Nitrogen and Phosphorus Loss Rates' can be sought.		without a s32 analysis being undertaken and be inserted into the Plan through a First Schedule process. The policy should be amended to only require the preparation of a Farm Environment Plans from 2017.
Irrigation New Zealand Inc	52278	V1pLWRP-1057	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	The GMPNPLR are yet to be developed so the effect of this policy cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertaken and be inserted into the Plan through a First Schedule process. The policy should be amended to only require the preparation of a Farm Environment Plans from 2017.
Synlait Farms Ltd	52287	V1pLWRP-1030	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	The GMPNPLR are yet to be developed so the effect of this policy cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertaken and be inserted into the Plan through a First Schedule process. The policy should be amended to only require the preparation of a Farm Environment Plans from 2017
Fonterra Co-operative Group Limited	52333	V1pLWRP-1238	Delete Policy 11.4.13. Replacement of the provision with a commitment (in a method or advisory note) to develop Good Management	Support in Part	The GMPNPLR are yet to be developed so the effect of this policy cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			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.		without a s32 analysis being undertaken and be inserted into the Plan through a First Schedule process. The policy should be amended to only require the preparation of a Farm Environment Plans from 2017.
Canterbury Grasslands Group	52314	V1pLWRP-1464	Submitter seeks any nitrogen loss reduction to be phased in over a period of at least 25 years.	Support in Part	Support in part to the extent that the intergenerational nature of nutrient management is to be addressed by setting longer timeframes for transition to managing within the new limit that is set. We consider it may be necessary to transition to a more desirable state over a longer and perhaps an intergenerational timeframe with staged review.
Dairy Holdings Ltd	53683	V1pLWRP-1939	Delete Policy 11.4.13. Replace with a method requiring the Council to commit to the development of the Good Management Practice Nitrogen and Phosphorous Loss Rates for inclusion in a subsequent notified plan variation (with an expectation that those rates will be complied with from 2017).	Support in Part	The GMPNPLR are yet to be developed so the effect of this policy cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertaken and be inserted into the Plan through a First Schedule process. The policy should be amended to only require the preparation of a Farm Environment Plans from 2017.
Mrs Myra Manson	52173	V1pLWRP-57	Delete reference to percentage in Policy 11.4.14(b), as more science is required to know if the percentages are correct.	Support	Policy 11.4.14 should be deleted, 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.
Mr Joel Townshend	52175	V1pLWRP-73	Delete clause (b) of Policy 11.4.14 as it is unachievable and should be farm by farm basis and realistic.	Support	Policy 11.4.14 should be deleted, or amend the policy to take into account revised assessments

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
					that are developed through the process to better reflect the impact on jobs and economic development opportunities.
New Zealand King Salmon Limited	52214	V1pLWRP-142	Retain Policy 11.4.14.	Oppose	Policy 11.4.14 should be deleted, 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
Te Taumutu Rūnanga	52215	V1pLWRP-283	Retain Policy 11.4.14	Oppose	Policy 11.4.14 should be deleted, 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
Director General of Conservation	52225	V1pLWRP-205	Retain Policy 11.4.14.	Oppose	Policy 11.4.14 should be deleted, 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
Central Plains Water Ltd	52239	V1pLWRP-369	Delete Policy 11.4.14 and include a method requiring the Council to commit to a nitrogen reduction strategy for inclusion in a subsequent Notified Plan Variation along with Good Management Practice, as per submission on Policy 11.4.13.	Support	Policy 11.4.14 should be deleted, 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
Beef +Lamb New Zealand	52292	V1pLWRP-573	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.	Oppose	Policy 11.4.14 should be deleted, 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

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Ravensdown Fertiliser Co-operative Limited	52249	V1pLWRP-830	Amend 11.4.14 (b)(i) to 20%	Oppose	Policy 11.4.14 should be deleted, 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
Mr Martin Bruce	52279	V1pLWRP-755	Delete Policy 11.4.14.	Support	Policy 11.4.14 should be deleted, 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
Fish and Game Council North Canterbury	52310	V1pLWRP-664	Retain Policy 11.4.14.	Oppose	Policy 11.4.14 should be deleted, 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
North Canterbury Province of Federated Farmers NZ Inc	52318	V1pLWRP-849	Delete Policy 11.4.14 and replace with the following: <u>Policy 11.4.14</u> <u>Require properties and farm enterprises to develop and implement Farm Environment Plans in accordance with Schedule 7, Part A to assist in managing reductions in discharges as follows:</u> <u>(i) Any property or farming enterprise within the 'Te Waihora Cultural Landscape Values Management Area' and greater than 10 hectares in area is to implement a Farm Environmental Plan to minimise the risk of discharging phosphorous, sediment, microbial contaminants and other contaminants to water by 1 January 2016.</u> <u>(ii) Any property or farming enterprise within the areas zoned 'Phosphorous Sediment Risk Area' on the</u>	Support in Part	Policy 11.4.14 should be deleted, 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

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p>planning maps is to <u>implement a Farm Environmental Plan to minimise the risk of discharging phosphorous, sediment and microbial contaminants to water by 1 January 2017 if the property or farm enterprise is greater than 50 ha in size or by 01 January 2020 if the property or farm enterprise is between 10 and 50 hectares in size.</u></p> <p><u>Any property or farming enterprise located within the areas Zoned Nitrate Loss Risk Area and has a nitrogen baseline that exceeds 15kg per hectare per annum, or 20kg per hectare per annum in areas shown on Planning Map XX as light or very light soils, is to implement a Farm Environmental Plan to minimise the discharge of nitrogen-nitrates by 01 January 2017 if the property or farm enterprise is greater than 50 hectares in size or by 01 January 2021 if the property or farm enterprise is between 10 and 50 hectares in size.</u></p>		
Committee Malvern Hills Protection Society	51995	V1pLWRP-1178	Retain Policy 11.4.14.	Oppose	Policy 11.4.14 should be deleted, 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
Environmental Advisor NZPork	52107	V1pLWRP-1163	<p>Amend Policy 11.4.14 point (b)</p> <p>(b) Where a property's nitrogen loss calculation is greater than 15kg of nitrogen per hectare per annum, make the <u>the following</u> further percentage reduction s 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</u></p>	Support in Part	Policy 11.4.14 should be deleted, 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

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p><u>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></p> <p>(i) 30% for dairy (ii) 22% for dairy support; or (iii) 20% for pigs; or (iv) 13% for irrigated sheep, beef or deer; or (v) 10% for dryland sheep and beef; or (vi) 7% for arable; or (vii) 5% for fruit, viticulture or vegetables; (viii) 0% for any other land use.</p>		
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1274	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	Oppose in Part	The intergenerational nature of nutrient management is to be addressed by setting longer timeframes for transition to managing within the new limit that is set. We consider it may be necessary to transition to a more desirable state over a longer and perhaps an intergenerational timeframe with staged review.
Dairy NZ	52271	V1pLWRP-1351	<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 with the good management practice nitrogen loss rates, be introduced to the Plan by way of the</u></p>	Support	Policy 11.4.14 should be deleted, 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

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<u>First Schedule process.</u>		
Mr and Mrs Frank and Robyn Lamborn	52275	V1pLWRP-1131	Delete clause (b) in policy 11.4.14 with percentage differences across farming types and amend to include one percentage that is the same for all. Or, alternatively re-evaluate the percentages to ensure a fairer way to plan for nitrogen loss reduction.	Support	Policy 11.4.14 should be deleted, 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
McKavanagh Holdings Ltd	52276	V1pLWRP-1112	Retain use of Farm Environment Plans in Policy 11.4.14. Delete clause (b) in policy 11.4.14 with percentage differences across farming types and amend to include one percentage that is the same for all. Or, alternatively re-evaluate the percentages to ensure a fairer way to plan for nitrogen loss reduction. Amend policy 11.4.14 to provide for the ability to share nitrogen across farms in the same catchment or implement a tradable nitrogen scheme.	Support	Policy 11.4.14 should be deleted, 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
Irrigation New Zealand Inc	52278	V1pLWRP-1059	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	The GMPNPLR are yet to be developed so the effect of this policy cannot be determined. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertaken and be inserted into the Plan through a First Schedule process.
Synlait Farms Ltd	52287	V1pLWRP-1146	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	Support	Policy 11.4.14 should be deleted, 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

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			better allocation mechanism may be provided at the hearing or discussed with industry prior to the hearing.		
Mr & Mrs Roger and Susan Bates	52320	V1pLWRP-1032	Submitter opposes the proposed 30% further reduction in nitrate loss to be imposed on dairy properties from 2022, and states this [reduction] will have a dramatic effect on their business almost to the point of being unsustainable (figures included in submission).	Support	Policy 11.4.14 should be deleted, 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
Lake Ellesmere Dairy Farmers Group	52329	V1pLWRP-1051	Delete Policy 11.4.14 and review when the Good Management Practice Nitrogen Loss numbers are determined.	Support	Policy 11.4.14 should be deleted, 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
Fonterra Co-operative Group Limited	52333	V1pLWRP-1239	<p>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></p> <p>Or,</p> <p>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 more manageable reduction rate applied (after more comprehensive cost</p>	Support in Part	Policy 11.4.14 should be deleted, 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

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			analysis).		
The Canterbury Farming Company	52306	V1pLWRP-1652	<p>Delete policy 11.4.14 and replace with the following: <u>Policy 11.4.14</u> <u>Require properties and farm enterprises to develop and implement Farm Environment Plans in accordance with Schedule 7, Part A to assist in managing reductions in discharges as follows:</u></p> <p>(i) <u>Any property or farming enterprise within the 'Te Waihora Cultural Landscape Values Management Area' and greater than 10 hectares in area is to implement a Farm Environmental Plan to minimise the risk of discharging phosphorous, sediment, microbial contaminants and other contaminants to water by 1 January 2016</u></p> <p>(ii) <u>Any property or farming enterprise within the areas zoned 'Phosphorous Sediment Risk Area' on the planning maps is to implement a Farm Environmental Plan to minimise the risk of discharging phosphorous, sediment and microbial contaminants to water by 1 January 2017 if the property or farm enterprise is greater than 50 ha in size or by 01 January 2020 if the property or farm enterprise is between 10 and 50 hectares in size.</u></p> <p>(iii) <u>Any property or farming enterprise located within the areas Zoned Nitrate Loss Risk Area and has a nitrogen baseline that exceeds 15kg per hectare per annum, or 20kg per hectare per annum in areas shown on Planning Map XX as light or very light</u></p>	Support in Part	Policy 11.4.14 should be deleted, 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

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<u>soils, is to implement a Farm Environmental Plan to minimise the discharge of nitrogen-nitrates by 01 January 2017 if the property or farm enterprise is greater than 50 hectares in size or by 01 January 2021 if the property or farm enterprise is between 10 and 50 hectares in size.</u>		
Canterbury Grasslands Group	52314	V1pLWRP-1468	Submitter seeks any nitrogen loss reduction to be phased in over a period of at least 25 years.	Support in Part	The intergenerational nature of nutrient management is to be addressed by setting longer timeframes for transition to managing within the new limit that is set. We consider it may be necessary to transition to a more desirable state over a longer and perhaps an intergenerational timeframe with staged review.
Canterbury Grasslands Group	52314	V1pLWRP-1441	Amend to remove references to reductions post-2022.	Support in Part	The intergenerational nature of nutrient management is to be addressed by setting longer timeframes for transition to managing within the new limit that is set. We consider it may be necessary to transition to a more desirable state over a longer and perhaps an intergenerational timeframe with staged review.
Dairy Holdings Ltd	53683	V1pLWRP-1940	Delete Policy 11.4.14. Replace with a method requiring the Council to commit to a nitrogen reduction strategy for inclusion in the subsequent notified plan variation referred to in DHL's sought relief in respect of Policy 11.4.13	Support	Policy 11.4.14 should be deleted, 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
New Zealand King Salmon Limited	52214	V1pLWRP-143	Retain Policy 11.4.15.	Support in Part	There is merit in establishing criteria where nitrogen limits or targets may not be met. The criteria should be based on the nitrogen baseline as the known and quantified factor. The criteria should also address: <ul style="list-style-type: none"> The nature of the operation and the accuracy of the nitrogen baseline figure for the operation or property.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
					<ul style="list-style-type: none"> • The nature of the operation and limitations in achieving the nitrogen baseline. • Change of land use from the 'baseline land use'. • The costs association with achieving the nitrogen baseline.
Te Taumutu Rūnanga	52215	V1pLWRP-284	No specific decision requested. Submitter concerned that Policy 11.4.15 [extension of time to achieve nitrogen loss reductions in Policy 11.4.14] waters down other policies and to strengthen if required.	Support in Part	<p>There is merit in establishing criteria where nitrogen limits or targets may not be met. The criteria should be based on the nitrogen baseline as the known and quantified factor. The criteria should also address:</p> <ul style="list-style-type: none"> • The nature of the operation and the accuracy of the nitrogen baseline figure for the operation or property. • The nature of the operation and limitations in achieving the nitrogen baseline. • Change of land use from the 'baseline land use'. • The costs association with achieving the nitrogen baseline.
Director General of Conservation	52225	V1pLWRP-206	Retain Policy 11.4.15.	Support in Part	<p>There is merit in establishing criteria where nitrogen limits or targets may not be met. The criteria should be based on the nitrogen baseline as the known and quantified factor. The criteria should also address:</p> <ul style="list-style-type: none"> • The nature of the operation and the accuracy of the nitrogen baseline figure for the operation or property. • The nature of the operation and limitations in achieving the nitrogen baseline. • Change of land use from the 'baseline land use'.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
					<ul style="list-style-type: none"> The costs association with achieving the nitrogen baseline.
Ravensdown Fertiliser Co-operative Limited	52249	V1pLWRP-831	Retain Policy 11.4.15.	Support in Part	<p>There is merit in establishing criteria where nitrogen limits or targets may not be met. The criteria should be based on the nitrogen baseline as the known and quantified factor. The criteria should also address:</p> <ul style="list-style-type: none"> The nature of the operation and the accuracy of the nitrogen baseline figure for the operation or property. The nature of the operation and limitations in achieving the nitrogen baseline. Change of land use from the 'baseline land use'. The costs association with achieving the nitrogen baseline.
North Canterbury Province of Federated Farmers NZ Inc	52318	V1pLWRP-850	Delete Policy 11.4.15.	Support in Part	<p>There is merit in establishing criteria where nitrogen limits or targets may not be met. The criteria should be based on the nitrogen baseline as the known and quantified factor. The criteria should also address:</p> <ul style="list-style-type: none"> The nature of the operation and the accuracy of the nitrogen baseline figure for the operation or property. The nature of the operation and limitations in achieving the nitrogen baseline. Change of land use from the 'baseline land use'. The costs association with achieving the nitrogen baseline.
Environmental Advisor NZPork	52107	V1pLWRP-1168	Amend Policy 11.4.15. Add the following to align with the	Support in Part	<p>There is merit in establishing criteria where nitrogen limits or targets may not be met. The criteria should</p>

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			Proposed Amendments to the NPS Freshwater Management <u>(d) Any implications on the resource user, people or community, including social and economic implications.</u>		be based on the nitrogen baseline as the known and quantified factor. The criteria should also address: <ul style="list-style-type: none"> • The nature of the operation and the accuracy of the nitrogen baseline figure for the operation or property. • The nature of the operation and limitations in achieving the nitrogen baseline. • Change of land use from the 'baseline land use'. • The costs association with achieving the nitrogen baseline.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1275	Amend Policy 11.4.15 to include a sentence: "Provide <u>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.	Oppose	The intergenerational nature of nutrient management is to be addressed by setting longer timeframes for transition to managing within the new limit that is set. We consider it may be necessary to transition to a more desirable state over a longer and perhaps an intergenerational timeframe with staged review.
Dairy NZ	52271	V1pLWRP-1353	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 regarded 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	Support in Part	Hort NZ has also sought the deletion of Policy 11.4.14 to which 11.4.15 refers. There is merit in establishing criteria where nitrogen limits or targets may not be met. The criteria should be based on the nitrogen baseline as the known and quantified factor. The criteria should also address: <ul style="list-style-type: none"> • The nature of the operation and the accuracy of the nitrogen baseline figure for the operation or property. • The nature of the operation and limitations in achieving the nitrogen baseline.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			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		<ul style="list-style-type: none"> Change of land use from the 'baseline land use'. The costs association with achieving the nitrogen baseline.
Fonterra Co-operative Group Limited	52333	V1pLWRP-1242	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 regarded 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	Hort NZ has also sought the deletion of Policy 11.4.14 to which 11.4.15 refers. There is merit in establishing criteria where nitrogen limits or targets may not be met. The criteria should be based on the nitrogen baseline as the known and quantified factor. The criteria should also address: <ul style="list-style-type: none"> The nature of the operation and the accuracy of the nitrogen baseline figure for the operation or property. The nature of the operation and limitations in achieving the nitrogen baseline. Change of land use from the 'baseline land use'. The costs association with achieving the nitrogen baseline.
The Canterbury Farming Company	52306	V1pLWRP-1626	Delete Policy 11.4.15.	Support in Part	There is merit in establishing criteria where nitrogen limits or targets may not be met. The criteria should be based on the nitrogen baseline as the known and quantified factor. The criteria should also address: <ul style="list-style-type: none"> The nature of the operation and the accuracy of the nitrogen baseline figure for the operation or property.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
					<ul style="list-style-type: none"> The nature of the operation and limitations in achieving the nitrogen baseline. Change of land use from the 'baseline land use'. The costs association with achieving the nitrogen baseline.
Mrs Susan Thomley	52180	V1pLWRP-65	Delete Policy 11.4.16 or Amend to include the words " <u>or such limit other than 80 given development and refinement of nitrogen leaching measurement techniques</u> "	Support in Part	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.
Mr Joel Townshend	52175	V1pLWRP-76	Retain Policy 11.4.16.	Oppose	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.
New Zealand King Salmon Limited	52214	V1pLWRP-144	Retain Policy 11.4.16.	Oppose	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.
Te Taumutu Rūnanga	52215	V1pLWRP-285	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.	Oppose	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.
Director General of Conservation	52225	V1pLWRP-207	Retain Policy 11.4.16.	Oppose	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.
Ravensdown Fertiliser Co-operative Limited	52249	V1pLWRP-832	Retain policy 11.4.16, subject to confirming 80kg/ha/pa is appropriate.	Oppose	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.

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North Canterbury Province of Federated Farmers NZ Inc	52318	V1pLWRP-851	Delete Policy 11.4.16	Support	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.
Committee Malvern Hills Protection Society	51995	V1pLWRP-1179	Submitter seeks a reduction from 80kgs to 50kgs or less and an earlier timeframe (not specified in submission).	Oppose	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.
Environmental Advisor NZPork	52107	V1pLWRP-1171	Retain Policy 11.4.16.	Oppose	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.
Synlait Farms Ltd	52287	V1pLWRP-1158	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.	Oppose	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.
ANZCO, CMP Canterbury & CMP Rakaia	52274	V1pLWRP-1486	Amend Policy 11.4.16 as follows: "Despite Policy 11.4.14 and 11.4.15, from 2037 no property or farming enterprise <u>undertaking a farming activity</u> shall leach more than 80 kg of nitrogen per hectare per annum."	Oppose	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.
The Canterbury Farming Company	52306	V1pLWRP-1653	Delete Policy 11.4.16	Support	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.
Mr and Mrs Michael and Annette Hamblett	52311	V1pLWRP-1536	Amend to reduce leaching to below 80kg/ha and in a shorter timeframe (level and timeframe not specified).	Support	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Mr Joel Townshend	52175	V1pLWRP-75	Amend Policy 11.4.17 to ensure achievable and realistic.	Support	The policy should be deleted and replaced with a more flexible set of instruments to management within limits.
New Zealand King Salmon Limited	52214	V1pLWRP-145	Retain Policy 11.4.17.	Oppose	The policy should be deleted and replaced with a more flexible set of instruments to management within limits
Central Plains Water Ltd	52239	V1pLWRP-372	<p>Amend Policy 11.4.17 to read :</p> <p>To achieve the farming activity water quality targets in Section 11.7.3 require all farming activities within the command area of any Irrigation Scheme listed in Table 11(j), where they are irrigated with water from the Scheme :</p> <p>(a) To collectively not exceed the Irrigation Scheme Nitrogen Limits in Table 11(j) ; and (b) Where properties convert from dry land to irrigated land use, the nitrogen loss rates from the outset shall be managed in accordance with Policy 11.4.14(b).</p>	Support in Part	The policy should be deleted and replaced with a more flexible set of instruments to management within limits
Fonterra Co-operative Group Limited	52333	V1pLWRP-1244	<p>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.</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>	Support in Part	Support in part to the extent that there is a need to assess alternative methods to achieve nutrient and water management outcomes

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Dairy NZ	52271	V1pLWRP-1519	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 indication of when or how, these activities are to be delivered and considers that the Variation could go some way further in this regard.	Support in Part	Support in part to the extent that there is a need to assess alternative methods to achieve nutrient and water management outcomes
Fonterra Co-operative Group Limited	52333	V1pLWRP-1249	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 indication of when or how, these activities are to be delivered and considers that the Variation could go some way further in this regard.	Support in Part	Support in part to the extent that there is a need to assess alternative methods to achieve nutrient and water management outcomes
Dairy NZ	52271	V1pLWRP-1520	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. 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.	Support in Part	Support in part to the extent that there is a need to assess alternative methods to achieve nutrient and water management outcomes
Fonterra Co-operative Group Limited	52333	V1pLWRP-1250	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	Support in Part	Support in part to the extent that there is a need to assess alternative methods to achieve nutrient and water management outcomes

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p>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>		
Dairy NZ	52271	V1pLWRP-1521	<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>	Support in Part	Support in part to the extent that there is a need to assess alternative methods to achieve nutrient and water management outcomes
New Zealand King Salmon Limited	52214	V1pLWRP-146	Retain Policy 11.4.21.	Oppose	There needs to be a review of the basis for Table 11(e) and to ensure that the figures derived are robust.
Director General of Conservation	52225	V1pLWRP-211	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 <u>and targets</u> in Table 11(e) are met.	Oppose	There needs to be a review of the basis for Table 11(e) and to ensure that the figures derived are robust.
Te Taumutu Rūnanga	52215	V1pLWRP-291	Retain Policy 11.4.21	Oppose	There needs to be a review of the basis for Table 11(e) and to ensure that the figures derived are robust.

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Nga Rūnanga and Te Rūnanga O Ngāi Tahu	52233	V1pLWRP-404	Delete Policy 11.4.21 Submitter has proposed replacing Policies 11.4.21 to 11.4.32 with alternative policies	Oppose in part	There needs to be a review of the basis for Table 11(e) and to ensure that the figures derived are robust.
Central Plains Water Ltd	52239	V1pLWRP-373	Retain Policy 11.4.21.	Oppose in part	There needs to be a review of the basis for Table 11(e) and to ensure that the figures derived are robust.
Fish and Game Council North Canterbury	52310	V1pLWRP-674	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.	Oppose in part	There needs to be a review of the basis for Table 11(e) and to ensure that the figures derived are robust.
Mrs Jane Demeter	52312	V1pLWRP-1012	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).	Oppose	There needs to be a review of the basis for Table 11(e) and to ensure that the figures derived are robust.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1286	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	There needs to be a review of the basis for Table 11(e) and to ensure that the figures derived are robust.
Mr Joel Townshend	52175	V1pLWRP-81	Delete Policy 11.4.22 and provide for transfers as effects on the environment are less than minor	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Director General of Conservation	52225	V1pLWRP-212	Retain Policy 11.4.22.	Oppose	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits.
HydroTrader	52235	V1pLWRP-192	Amend Policy 11.4.22 as follows: Restrict <u>Manage</u> the transfer of water permits within the Rakaia-Selwyn and Selwyn-Waimakariri water allocation zones to minimise the cumulative effects on flows in hill-fed lowland and spring-fed plains rivers from the use of allocated but unused water, by requiring that : (a) Irrigation scheme shareholders within the Irrigation Scheme Area shown on the Planning Maps do not transfer their permits to take and use groundwater; and (b) No permit to take and use groundwater is transferred from down plains to up plains; and <u>In all other cases 50% of any transferred water is surrendered appropriate conditions are imposed to avoid increases in water usage that will have an adverse effect (cumulatively or otherwise) on flows in hill-fed lowland and spring-fed plains rivers.</u>	Support in part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits.
Ellesmere Irrigation Society Inc	52210	V1pLWRP-482	Retain Policy 11.4.22	Oppose	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
					efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits.
Dunsandel Groundwater Users Group	2221	V1pLWRP-327	<p>Delete 11.4.22(a) that requires that irrigation scheme shareholders do not transfer their permits to take and use groundwater; and Amend 11.4.22(c) to require surrender of 25%, rather than 50% [of any transferred water]; and Add an additional sub-paragraph to Policy 11.4.22 which allows the full transfer of groundwater down-plains if it is replacing a surface water take that has been transferred up-plains and to a scheme; and</p> <p>Add an additional subparagraph to Policy 11.4.22 which allows the full transfer of water from one parcel of land to another, where both parcels are owned by the consent holder or related entity.</p>	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits.
Central Plains Water Ltd	52239	V1pLWRP-374	<p>Amend Policy 11.4.22 to read: Restrict <u>Manage</u> the transfer of water permits <u>from site to site</u> within the Rakaia-Selwyn and Selwyn-Waimakariri water allocation zones to minimise the cumulative effects on flows in hill-fed lowland and spring-fed plains rivers from the use of allocated but unused water, by requiring <u>providing</u> that: (a) <u>For land irrigated by an Irrigation Scheme, within the Irrigation Scheme Area shown on the Planning Maps,</u> any groundwater consents applying to that land do not</p>	Support in part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p>can be transfer red their permits to take and use groundwater to:</p> <p><u>(i) the Irrigation Scheme; or</u></p> <p><u>(ii) to another Property owned by the same person or a related entity (as that term is defined in section 2(3) of the Companies Act 1993) and</u></p> <p>(b) No permit to take and use groundwater is transferred from down-plains to up-plains; and (c) In all other cases 50% of any transferred water is surrendered.</p>		
Bowden Environmental	52242	V1pLWRP-589	Delete Policy 11.4.22	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits.
Canterbury Aggregate Producers Group	52289	V1pLWRP-633	Delete Policy 11.4.22(c).	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Fish and Game Council North Canterbury	52310	V1pLWRP-675	Retain Policy 11.4.22.	Oppose	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits.
North Canterbury Province of Federated Farmers NZ Inc	52318	V1pLWRP-871	Delete Policy 11.4.22(c) - the requirement to surrender 50% of any transferred water in the Rakaia-Selwyn and Selwyn-Waimakariri Water Allocation Zones.	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits.
Committee Malvern Hills Protection Society	51995	V1pLWRP-1181	Retain Policy 11.4.22.	Oppose	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Erralyn Farm Ltd & Krysette Ltd	52263	V1pLWRP-1361	Amend Policy 11.4.22(a) to allow the transfer of groundwater permits held by irrigation scheme shareholders within the Irrigation Scheme Area to other sites within the irrigation scheme; and amend Policy 11.4.22(c) to require surrender of up to 25%, rather than 50%; and add an additional subparagraph to Policy 11.4.22 to allow the transfer of a groundwater permit in the Rakaia-Selwyn or the Selwyn-Waimakariri Combined Surface and Groundwater Allocation Zones without surrender, if the permit transferred is intended to replace an existing consent, and: (a) No more water is transferred than that authorised for extraction pursuant to the existing consent; and (b) The existing consent is surrendered on completion of a successful transfer.	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1294	Retain Policy 11.4.22.	Oppose	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Dairy NZ	52271	V1pLWRP-1355	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>	Oppose in Part	Horticulture NZ seeks the deletion of the 50% surrender requirement.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Mr and Mrs Frank and Robyn Lamborn	52275	V1pLWRP-1133	Amend Policy 11.4.22 to allow transfer of water permits without restriction.	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
McKavanagh Holdings Ltd	52276	V1pLWRP-1113	Amend Policy 11.4.22 as follows, to enable the transfer of existing consents within a farming enterprise: (a) For land irrigated by an Irrigation Scheme - shareholders of existing within the Irrigation Scheme Area shown on the Planning Maps groundwater consents applying to that land do not can be transferred their permits to take and use groundwater within their farm enterprise; and; and (c) In all other cases 50% of any transferred water is surrendered.	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Irrigation New Zealand Inc	52278	V1pLWRP-1061	Amend clause (a) of Policy 11.4.22 as follows to provide for the transfer of existing water allocation consents to dryland blocks within a farming enterprise that plans to use Central Plains Water on their existing irrigated land, and provide for use to deal with reliability issues from Central Plains Water surface water supply, prior to storage being addressed: "... Planning Maps can only transfer their permits to take and	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p><u>use groundwater within their farming enterprise "</u></p> <p>In addition, 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 above, so that the definition of 'farming enterprise' covers multiple discrete parcels of land not just contiguous parcels.</p> <p>Delete clauses (b) and (c) in Policy 11.4.22 as they are nonsensical, inequitable and a crude over-allocation clawback mechanism.</p>		water use across water user groups and help farmers to manage within environmental limits
Synlait Farms Ltd	52287	V1pLWRP-1169	<p>Amend Policy 11.4.22 as follows:</p> <p>Delete clause (a). Submitter considers clause (b) is contrary to policy 11.4.21 in which surface and groundwater are managed together as one resource. Amend clause (c) so that surrender volumes are considered in light of efficient irrigation.</p>	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Lake Ellesmere Dairy Farmers Group	52329	V1pLWRP-1044	<p>Delete reference to 50% surrender in Policy 11.4.22(c). The percentage surrender should be determined on a case by case basis.</p>	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Fonterra Co-operative Group Limited	52333	V1pLWRP-1252	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>	Opposed in Part	Horticulture NZ seeks the deletion of the 50% surrender requirement.
ANZCO, CMP Canterbury & CMP Rakaia	52274	V1pLWRP-1510	Amend Policy 11.4.22 by deleting 11.4.22 (c): " (c) In all... surrendered."	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
The Canterbury Farming Company	52306	V1pLWRP-1632	Delete Policy 11.4.22(c) the requirement to surrender 50% of any transferred water in the Rakaia-Selwyn and Selwyn-Waimakariri Water Allocation Zones.	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Dairy Holdings Ltd	53683	V1pLWRP-1941	Amend Policy 11.4.22 as follows: Restrict <u>Manage</u> the transfer of water permits <u>from site to site</u> within the Rakaia-Selwyn and Selwyn-Waimakariri water allocation zones to minimise the cumulative effects on flows in hill-fed lowland and spring-fed plains rivers	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p>from the use of allocated but unused water, by requiring providing that:</p> <p>(a) For land irrigated by an Irrigation Scheme, within the Irrigation Scheme Area shown on the Planning Maps, any groundwater consents applying to that land do not can be transfer red their permits to take and use groundwater to:</p> <p>(i) <u>the Irrigation Scheme</u>; or</p> <p>(ii) <u>to another Property owned by the same person or a related entity (as that term is defined in section 2(3) of the Companies Act 1993); and</u></p> <p>(b) No permit to take and use groundwater is transferred from down-plains to up-plains; and (c) In all other cases 50% of any transferred water is surrendered.</p>		Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Ellesmere Irrigation Society Inc	52210	V1pLWRP-483	Delete Policy 11.4.23. The phrase "demonstrated use" is not defined. The existing phrase is "reasonable use" which is fully defined and reflects the water requirements to meet irrigation demand in a dry season.	Support	The policy does not state how 'demonstrated use' will be assessed.
Bowden Environmental	52242	V1pLWRP-590	Delete Policy 11.4.23	Support	The policy does not state how 'demonstrated use' will be assessed.
Fish and Game Council North Canterbury	52310	V1pLWRP-676	Retain Policy 11.4.23.	Oppose	The policy does not state how 'demonstrated use' will be assessed
North Canterbury Province of Federated Farmers NZ Inc	52318	V1pLWRP-868	<p>Delete Policy 11.4.23 and replace with: <u>"Reallocate water to existing consent holders as follows: 1. An allocation based on Reasonable Use as calculated in accordance with Schedule 10;</u></p> <p><u>2. Divide the allocation between an A allocation being the volume of water which's is located reasoned for the</u></p>	Support in Part	The policy does not state how 'demonstrated use' will be assessed.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<u>repurposed use in an average rainfall year as calculate day Environment Canterbury and a B allocation which's is located available for use to ensure reliably of supply in nine years out of ten for a system with an application efficiency of 80%."</u>		
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1295	Retain Policy 11.4.23.	Oppose	The policy does not state how 'demonstrated use' will be assessed
Irrigation New Zealand Inc	52278	V1pLWRP-1065	Amend Policy 11.4.23 so demonstrated use is not used as a reallocation mechanism and revised policy to state: "...at a rate and volume that reflects demonstrated use <u>reasonable use based on a nine in ten year reliability and 80% application efficiency</u> ."	Support in Part	The policy does not state how 'demonstrated use' will be assessed.
Synlait Farms Ltd	52287	V1pLWRP-1180	Amend Policy 11.4.23 so that allocation is based on technical efficiency and reliability. When water is reallocated do not decrease the rate of take just volume. Allocations must also allow for future growth of an activity, based on realistic expectations.	Support in Part	The policy does not state how 'demonstrated use' will be assessed.
Robin Cullen	52317	V1pLWRP-1053	Delete Policy 11.4.23. Submitter opposes any policy or rule that would reduce their present allocation or adjust any future take to reflect their previous use. The submitter states this would unfairly restrict cropping and horticulture options they are able to pursue in the future.	Support	The policy does not state how 'demonstrated use' will be assessed.
Lake Ellesmere Dairy Farmers	52329	V1pLWRP-1042	Delete Policy 11.4.23.	Support	The policy does not state how 'demonstrated use' will be assessed.

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Group					
Fonterra Co-operative Group Limited	52333	V1pLWRP-1254	<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: <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.</u></p> <p>Give the term “demonstrated use” greater clarity by explicitly stating that return periods for dry conditions are taken into account.</p>	Support in Part	The policy does not state how ‘demonstrated use’ will be assessed.
Erralyn Farm Ltd & Krysette Ltd	52263	V1pLWRP-1401	Amend Policy 11.4.23 by replacing "demonstrated use" with "reasonable use".	Support in Part	The policy does not state how ‘demonstrated use’ will be assessed.
ANZCO, CMP Canterbury & CMP Rakaia	52274	V1pLWRP-1493	Amend Policy 11.4.23 as follows (or similar): "Only... <u>demonstrated use unless, in the case of industrial processing, it can be demonstrated that the water usage has grown over time and/or the rate and volume is necessary to meet projected demand and/or is</u>	Support in Part	The policy does not state how ‘demonstrated use’ will be assessed.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<u>necessary to provide water in times of drought ."</u>		
The Canterbury Farming Company	52306	V1pLWRP-1634	Delete Policy 11.4.23 and replace with: "Reallocate water to existing consent holders as follows: <u>An allocation based on Reasonable Use as calculated in accordance with Schedule 10;</u> <u>Divide the allocation between an A allocation being the volume of water which's is located reasoned for the repurposed use in an average e rainfall year as calculate day Environment Canterbury and a B allocation which's is located available for use to ensure reliably of supply in nine years out of ten for a system with an application efficiency of 80%."</u>	Support in Part	The policy does not state how 'demonstrated use' will be assessed.
Dairy Holdings Ltd	53683	V1pLWRP-1942	Amend Policy 11.4.23 as follows: Only reallocate water to existing resource consent holders at a rate and volume that reflects <u>the greater of :</u> (a) demonstrated use <u>the irrigation demand for the Property having regard to the long term availability and reliability of any other water sources; or</u> (b) <u>in the case of an Irrigation Scheme, the volume of water required to supply the Irrigation Scheme when fully developed.</u>	Support in Part	The policy does not state how 'demonstrated use' will be assessed.
Dunsandel Groundwater Users Group	52221	V1pLWRP-342	Amend Policy 11.4.26 so that "eight and a half" is replaced with "nine" [years out of ten] and the additional consented volume is determined in accordance with Schedule 10	Support	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.
Central Plains Water Ltd	52239	V1pLWRP-379	Amend Policy 11.4.26 to read: 11.4.26 <u>Notwithstanding Policy 11.4.23, w</u> Where a	Support	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			consent applicant holds shares in an Irrigation Scheme, limit any additional consented volumes to the volume required to meet demand conditions in nine eight and a half out of ten years for a system with an application efficiency of 80%.		method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.
Fish and Game Council North Canterbury	52310	V1pLWRP-683	Retain Policy 11.4.26.	Oppose	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.
North Canterbury Province of Federated Farmers NZ Inc	52318	V1pLWRP-869	Amend Policy 11.4.26 as follows: "Where a consent applicant holds shares in an irrigation scheme, limit any additional consented volumes to the volume required to meet demand conditions in eight and a half nine years out of ten for a system with an application efficiency of 80%."	Support	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1299	Retain Policy 11.4.26.	Oppose	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.
Irrigation New Zealand Inc	52278	V1pLWRP-1070	Amend Policy 11.4.26 so reliability of supply remains at a nine out of ten year level as follows: "...demand conditions in eight and a half nine out of ten years for a system..."	Support	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.
Synlait Farms Ltd	52287	V1pLWRP-1193	Amend Policy 11.4.26 so that consented volumes meet demand conditions in 9 out of 10 years (especially in light of Central Plains Water scheme becoming operational in	Support	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			this timeframe).		nine years out of ten, consistent with the Land and Water Plan.
Erralyn Farm Ltd & Krysett e Ltd	52263	V1pLWRP-1437	Amend Policy 11.4.26 so that "eight and a half" is replaced with "nine" and the additional consented volume is determined in accordance with schedule 10.	Support	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.
The Canterbury Farming Company	52306	V1pLWRP-1635	Amend Policy 11.4.26 as follows: "Where a consent applicant holds shares in an irrigation scheme, limit any additional consented volumes to the volume required to meet demand conditions in eight and a half <u>nine</u> years out of ten for a system with an application efficiency of 80%."	Support	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.
The Canterbury Farming Company	52306	V1pLWRP-1643	Amend Policy 11.4.26 as follows: "Where a consent applicant holds shares in an irrigation scheme, limit any additional consented volumes to the volume required to meet demand conditions in eight and a half <u>nine</u> years out of ten for a system with an application efficiency of 80%."	Support	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.
The Crossing Ltd	52398	V1pLWRP-1497	Amend Policy 11.4.26 to provide 9/10 year reliability to alpine river takes.	Support in Part	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.
Director General of Conservation	52225	V1pLWRP-217	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	There needs to be a review of the methodology for Tables (c) and (d) and amendments to ensure the figures derived are robust.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Fish and Game Council North Canterbury	52310	V1pLWRP-690	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	There needs to be a review of the methodology for Tables (c) and (d) and amendments to ensure the figures derived are robust.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1291	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	There needs to be a review of the methodology for Tables (c) and (d) and amendments to ensure the figures derived are robust.
Dairy NZ	52271	V1pLWRP-1357	Amend Policy 11.4.28 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 Table 11 (c) and (d) on new and replacement resource consents from 2025 <u>that reflect increased flows associated with groundwater and surface water body augmentation and reduction in groundwater abstraction, once those increased flows are observed in those water bodies.</u> If Environment Canterbury does not agree to the above relief, include, as a minimum, a new method committing Council to keep the minimum flows and restriction regime (and the timing of the introduction of those flows and regime) under review such that they are applied at the same time as, and at a level commensurate with, the increase in flows to the surface water bodies.	Support	There needs to be a review of the methodology for Tables (c) and (d) and amendments to ensure the figures derived are robust.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Fonterra Co-operative Group Limited	52333	V1pLWRP-1262	<p>Amend Policy 11.4.28 as follows</p> <p>Protect the ecological and cultural health of the Waikirkiri/Selwyn River and lowland streams by including the minimum flow and partial restrictions in Table 11 (c) and (d) on new and replacement resource consents from 2025 <u>that reflect increased flows associated with groundwater and surface water body augmentation and reduction in groundwater abstraction, once those increased flows are observed in those water bodies.</u></p> <p>Submitter also seeks 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).</p> <p>Or</p> <p>If Environment Canterbury does not agree to the above relief, include, as a minimum, a new method committing Council to keep the minimum flows and restriction regime (and the timing of the introduction of those flows and regime) under review such that they are applied at the same time as, and at a level commensurate with, the increase in flows to the surface water bodies</p>	Support	There needs to be a review of the methodology for Tables (c) and (d) and amendments to ensure the figures derived are robust.
New Zealand King Salmon Limited	52214	V1pLWRP-148	Retain Policy 11.4.29	Support	Policy is required to guide assessment when there is a significant loss of reliability due to the minimum flow and restrictions regime in Table 11(c). There needs to be clarity as to how that assessment would be made and a balancing of the values for the waterbody.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Director General of Conservation	52225	V1pLWRP-220	Delete Policy 11.4.29	Oppose	Policy is required to guide assessment when there is a significant loss of reliability due to the minimum flow and restrictions regime in Table 11(c). There needs to be clarity as to how that assessment would be made and a balancing of the values for the waterbody.
Fish and Game Council North Canterbury	52310	V1pLWRP-691	Delete Policy 11.4.29	Oppose	Policy is required to guide assessment when there is a significant loss of reliability due to the minimum flow and restrictions regime in Table 11(c). There needs to be clarity as to how that assessment would be made and a balancing of the values for the waterbody.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1292	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	Policy is required to guide assessment when there is a significant loss of reliability due to the minimum flow and restrictions regime in Table 11(c). There needs to be clarity as to how that assessment would be made and a balancing of the values for the waterbody.
Ravensdown Fertiliser Co-operative Limited	52249	V1pLWRP-837	Retain the restricted discretionary status of Rule 11.5.9, and amend the rule by clarifying the timeframe issue raised, and deleting the requirement for Good Management Practice phosphorus loss rates to be applied in matter of discretion 2.	Support	Good Management Practice Nitrogen and Phosphorous Loss Rates (GMPNPLR) are yet to be developed. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertake and be inserted into the plan through a 1 st schedule process.
Dairy NZ	52271	V1pLWRP-1369	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	Support	Good Management Practice Nitrogen and Phosphorous Loss Rates (GMPNPLR) are yet to be developed. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertake and be inserted into the plan through a 1 st schedule process.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p>reviewed).</p> <p>The exercise of discretion is restricted to the following matters:</p> <ol style="list-style-type: none"> 1. The quality of, compliance with the Farm Environment Plan; and 2. The Good Management Practice Nitrogen and Phosphorous Loss Rates to be applied to the property in accordance with Policy 11.4.13(b); and 3. 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 <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> 4. The nitrogen load target for farming activities in Table 11(i); and... <p>The potential benefits of the activity to the applicant, the community and the environment.</p>		
Irrigation New Zealand Inc	52278	V1pLWRP-1076	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	Good Management Practice Nitrogen and Phosphorous Loss Rates (GMPNPLR) are yet to be developed. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertaken and be inserted into the plan through a 1 st schedule process.
Synlait Farms Ltd	52287	V1pLWRP-1208	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	Support	Good Management Practice Nitrogen and Phosphorous Loss Rates (GMPNPLR) are yet to be developed. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			matters of discretion points 1 and 2 as written		undertake and be inserted into the plan through a 1 st schedule process.
Fonterra Co-operative Group Limited	52333	V1pLWRP-1287	<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).</p> <p>The exercise of discretion is restricted to the following matters:</p> <ol style="list-style-type: none"> 1. The quality of, compliance with the Farm Environment Plan; and 2. The Good Management Practice Nitrogen and Phosphorus Loss Rates to be applied to the property in accordance with Policy 11.4.13(b); and 3. 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 <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> 4. The nitrogen load target for farming activities in Table 11(i); and <p>The potential benefits of the activity to the applicant, the community and the environment</p>	Support	Good Management Practice Nitrogen and Phosphorous Loss Rates (GMPNPLR) are yet to be developed. Given the uncertainty a tool that is currently in development should not be implemented in a regulatory manner without a s32 analysis being undertaken and be inserted into the plan through a 1 st schedule process.
Dairy NZ	52271	V1pLWRP-1370	<p>Amend Rule 11.5.10 as follows. The use of land for a farming activity as part of a farming</p>	Support in Part	The uses of a discretionary activity status in this circumstance is not an appropriate resource

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p>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. <u>The exercise of discretion is restricted to the following matters.</u></p> <p><u>1. The quality of compliance with the Farm Environment Plan;</u></p> <p><u>and</u></p> <p><u>2. Existing nitrogen and phosphorus management practices on the property and the potential to adopt or improve management practices to reduce nutrient loss;</u></p> <p><u>and</u></p> <p><u>3. The nitrogen load target for farming activities in Table 11(i); and</u></p> <p><u>4. The potential benefits of the activity to the applicant, the community and the environment.</u></p>		management response. A farming enterprise should be included in the rules relating to properties or a specific restricted discretionary activity status that includes assessment of crop rotational systems and compliance with industry good practices.
Synlait Farms Ltd	52287	V1pLWRP-1209	Amend Rule 11.5.10 to be a "restricted discretionary" activity.	Support in Part	The uses of a discretionary activity status in this circumstance is not an appropriate resource management response. A farming enterprise should be included in the rules relating to properties or a specific restricted discretionary activity status that includes assessment of crop rotational systems and compliance with industry good practices.
Fonterra Co-operative Group Limited	52333	V1pLWRP-1293	<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>	Support in Part	The uses of a discretionary activity status in this circumstance is not an appropriate resource management response. A farming enterprise should be included in the rules relating to properties or a specific restricted discretionary activity status that

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<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. <u>The exercise of discretion is restricted to the following matters.</u></p> <p><u>1. The quality of, compliance with the Farm Environment Plan; and</u></p> <p><u>2. 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><u>3. The nitrogen load target for farming activities in Table 11(i); and</u></p> <p><u>The potential benefits of the activity to the applicant, the community and the environment.</u></p>		includes assessment of crop rotational systems and compliance with industry good practices.
Fonterra Co-operative Group Limited	52333	V1pLWRP-1297	<p>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	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource management response and allows for a thorough assessment of effects.
Dairy NZ	52271	V1pLWRP-1576	<p>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>	Support	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource management response and allows for a thorough assessment of effects.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
The Crossing Ltd	52398	V1pLWRP-1502	Retain Rule 11.5.11.	Oppose	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource management response and allows for a thorough assessment of effects.
New Zealand King Salmon Limited	52214	V1pLWRP-158	Retain Rule 11.5.12	Oppose	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource management response and allows for a thorough assessment of effects.
Director General of Conservation	52225	V1pLWRP-233	Retain Rule 11.5.12	Oppose	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource management response and allows for a thorough assessment of effects.
Ravensdown Fertiliser Co-operative Limited	52249	V1pLWRP-807	Amend the activity status that apply to the use of land for farming activities that exceed the Nitrogen Baseline after 1 January 2017 from Prohibited to Non-complying.	Support	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource management response and allows for a thorough assessment of effects.
Ravensdown Fertiliser Co-operative Limited	52249	V1pLWRP-839	Amend activity status to non-complying activity.	Support	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource management response and allows for a thorough assessment of effects.
Fish and Game Council North	52310	V1pLWRP-703	Retain Rule 11.5.12	Oppose	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Canterbury					management response and allows for a thorough assessment of effects
Committee Malvern Hills Protection Society	51995	V1pLWRP-1191	Retain Rule 11.5.12.	Oppose	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource management response and allows for a thorough assessment of effects
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1315	Retain Rule 11.5.12	Oppose	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource management response and allows for a thorough assessment of effects
Fonterra Co-operative Group Limited	52333	V1pLWRP-1302	<p>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	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource management response and allows for a thorough assessment of effects
Dairy NZ	52271	V1pLWRP-1523	<p>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</p>	Support	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource management response and allows for a thorough assessment of effects

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			a new policy limiting the granting of non-complying activities for nitrogen loss that exceeds the nitrogen baseline to exceptional cases.		
The Crossing Ltd	52398	V1pLWRP-1503	Retain Rule 11.5.12.	Oppose	Given uncertainties with establishing the nutrient baseline and the methodology on which it is based a non-complying activity status is a better resource management response and allows for a thorough assessment of effects
Mr Timothy Robilliard	52029	V1pLWRP-548	Delete condition 6 and require that water be reallocated on the basis of soil water holding capacity and rainfall.	Support in Part	A reliability factor of 9 years out of ten should be retained.
Mr Peter J. Chamberlain	52133	V1pLWRP-617	Delete condition 6 of Rule 11.5.32 so water rights are not withdrawn just because they haven't been used; it goes against good irrigation practice.	Support in Part	A reliability factor of 9 years out of ten should be retained
Dunsandel Groundwater Users Group	52221	V1pLWRP-340	Amend Rule 11.5.32(6). Delete reference to Method 1 (of Schedule 10) and instead allow Schedule 10 in its entirety to be used to determine consented volumes.	Support in Part	A reliability factor of 9 years out of ten should be retained
Mr Grant Bonniface	52155	V1pLWRP-654	Amend Rule 11.5.32 condition 6 so that the calculation for demonstrated use is carried out carefully to allow for spikes in requirement due to severe drought conditions that may not be evident in short term usage analysis	Support in Part	A reliability factor of 9 years out of ten should be retained
Mr Joel Townshend	52175	V1pLWRP-765	Delete condition 6 of Rule 11.5.32 and do not use demonstrated use as a benchmark. Allow consent holders to justify the consent and its content.	Support in Part	A reliability factor of 9 years out of ten should be retained
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1320	Retain Rule 11.5.32	Oppose	A review by Hort NZ of the reports on which Tables 11 (c), (d), (e), (f) and (g) are based have raised concerns about the methodology. The methodology should be reviewed and tables amended accordingly.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Mr and Mrs Frank and Robyn Lamborn	52275	V1pLWRP-1135	Delete condition 6 in Rule 11.5.32 relating to Policy 11.4.23, or alternatively set a date a reasonable time after accurate water metering data has been obtained for all water takes	Support in Part	A reliability factor of 9 years out of ten should be retained
McKavanagh Holdings Ltd	52276	V1pLWRP-1122	Delete condition 6 in Rule 11.5.32 relating to Policy 11.4.23, or alternatively set a date a reasonable time after accurate water metering data has been obtained for all water takes	Support in Part	A reliability factor of 9 years out of ten should be retained
Irrigation New Zealand Inc	52278	V1pLWRP-1079	Amend condition 6 of Rule 11.5.32 so method 1 is not used as a reallocation mechanism and revised condition to state: "...with method 4-2 in Schedule 10".	Support in Part	A reliability factor of 9 years out of ten should be retained
Erralyn Farm Ltd & Krysette Ltd	52263	V1pLWRP-1436	Amend Rule 11.5.32(6) and associated matter of discretion (2) by deleting the reference to Method 1 (of Schedule 10) and instead allowing Schedule 10 in its entirety to be used to determine consented volumes.	Support in Part	A reliability factor of 9 years out of ten should be retained
Dunsandel Groundwater Users Group	52221	V1pLWRP-341	Amend 11.5.33 condition 6 and associated matter of discretion (2). Delete reference to Method 1 (of Schedule 10) and instead allow Schedule 10 in its entirety to be used to determine consented volumes	Support in Part	A reliability factor of 9 years out of ten should be retained
Erralyn Farm Ltd & Krysette Ltd	52263	V1pLWRP-1432	Amend Rule 11.5.33(6) and associated matter of discretion (2) by deleting the reference to Method 1 (of Schedule 10) and instead allowing Schedule 10 in its entirety to be used to determine consented volumes; and consequential amendments as are necessary to give full effect to the intent of the relief sought.	Support in Part	A reliability factor of 9 years out of ten should be retained
Director General of Conservation	52225	V1pLWRP-245	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	Oppose	A review by Hort NZ of the reports on which Tables 11 (c), (d), (e), (f) and (g) are based have raised

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			11.5.36.		concerns about the methodology. The methodology should be reviewed and tables amended accordingly Given uncertainties a non-complying activity status is a better resource management response and allows for a thorough assessment of effects
HydroTrader	52235	V1pLWRP-193	Delete conditions 3 and 4 on transfer of groundwater and percentage of transferred water to be surrendered in Rakaia-Selwyn and Selwyn-Waimakariri allocation zones.	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Dunsandel Groundwater Users Group	52221	V1pLWRP-331	Delete condition 3(d) in Rule 11.5.37 [requiring that the transfer of groundwater is not from a person who holds shares in an irrigation scheme]; and Amend condition (4) in Rule 11.5.37 by replacing "50%" with "25%"; and Amend Rule 11.5.37 to provide for the submitter's two additions to Policy 11.4.22 (allowing the full transfer of groundwater down-plains if replacing a surface water take that has been transferred up-plains and to a scheme; and allowing the full transfer of water from one parcel of land to another where both parcels are owned by the consent holder or related entity)	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Central Plains Water Ltd	52239	V1pLWRP-433	Amend Rule 11.5.37 from 11.5.37(3)(d) to read as follows: <u>(d) the transfer is to another Property owned by the same</u>	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p><u>person or a related entity (as that term is defined in section 2(3) of the Companies Act 1993); and</u> (d) the transfer is not from a person who holds shares in an Irrigation Scheme in the Irrigation Scheme Area as shown on the Planning Maps; and (e) In addition for stream depleting groundwater takes: (i)) the transfer is within the same surface water catchment; and (ii) he take complies with the minimum flow and restriction regime in Table 11the and 11(d); and (iii)) the stream depletion effect is no greater in the transferred location than in the original location <u>unless an equivalent volume of surface water allocation from the affected water body can be surrendered alongside the transfer.; and</u> 4. If the transfer is within the Rakaia Solwyn or Solwyn-Waimakariri Combined Surface and Groundwater Allocation Zones 50% of the volume of transferred water is to be surrendered. The exercise of discretion is restricted to the following matters:</p> <ol style="list-style-type: none"> 1. The nature of the transfer, whether short term, long term, partial or full, and the apportioning of the maximum rate of take and annual volume in the case of a partial transfer; and 2. The appropriateness of conditions, including conditions on minimum flow, annual volume and other restrictions to mitigate effects; and 		<p>efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits</p>

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p>3. The reasonable need for the quantities of water sought, the intended use of the water and the ability of the applicant to abstract and use those quantities; and</p> <p>4. The <u>likely irrigation</u> efficiency of the exercise of the resource consent; and</p> <p>5. <u>In the case of surface water:</u> (a) <u>the reduction in the rate of take in times of low flow; and</u> 6. The method of preventing fish from entering any water intake.</p>		
Bowden Environmental	52242	V1pLWRP-596	Delete conditions 3(c) and 4 of Rule 11.5.37.	Support	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Canterbury Aggregate Producers Group	52289	V1pLWRP-637	Delete condition 4 of Rule 11.5.37 and provide for surrender as a matter of discretion.	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits

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Ellesmere Irrigation Society Inc	52210	V1pLWRP-893	<p>Amend Rule 11.5.37 to read:</p> <p>“The temporary or permanent transfer, in whole or in part, (other than to the new owner of the same property site to which the take and use of water relates and where the location of the take and use of water does not change) of a water permit to take or use surface water or groundwater within the Selwyn-Waihora catchment, is a restricted discretionary activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> 1. The reliability of supply for any other lawfully established water take is not reduced; and 2. In the case of surface water, the point of take remains within the same surface water catchment and the take complies with the minimum flow and restriction regime in Table s 11(c) and 11(d); or 3. In the case of groundwater: <ol style="list-style-type: none"> (a) the point of take is within the same groundwater allocation zone or combined surface and or groundwater allocation zone; and (b)) the bore interference effects as set out in Schedule 12 are acceptable; and (c) the transfer is not from down-plains to up-plains; and (d)) the transfer is not from a person who holds shares in an Irrigation Scheme in the Irrigation Scheme Area as shown on the Planning Maps; and 	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			<p>(e) In addition for stream depleting groundwater takes:</p> <p>(i)) the transfer is within the same surface water catchment; and</p> <p>(ii) he take complies with the minimum flow and restriction regime in Table 11(c) and 11(d); and</p> <p>(iii)) the stream depletion effect is no greater in the transferred location than in the original location <u>if it is has a depletion effect of more than 5 L/s ; and</u></p> <p>4 If the transfer is within the Rakaia-Selwyn or Selwyn-Waimakariri Combined Surface and or Groundwater Allocation Zones 50% of the volume of transferred water is to be surrendered.</p> <p>The exercise of discretion is restricted to the following matters:</p> <ol style="list-style-type: none"> 1. The nature of the transfer, whether short term, long term, partial or full, and the apportioning of the maximum rate of take and annual volume in the case of a partial transfer; and 2. The appropriateness of conditions, including conditions on minimum flow, annual volume and other restrictions to mitigate effects; and 3. The reasonable need for the quantities of water sought, the intended use of the water and the ability of the applicant to abstract and use those quantities; and 4. The efficiency of the exercise of the resource consent; and 5. The reduction in the rate of take in times of low flow; and <p>(b) The method of preventing fish from entering any water intake.</p>		

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Mr Martin Bruce	52279	V1pLWRP-743	No specific decision requested. Submitter opposes Rule 11.5.37 (4) - the need to surrender 50%.	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
North Canterbury Province of Federated Farmers NZ Inc	52318	V1pLWRP-872	Delete Rule 11.5.37 condition 4 and replace with: " <u>If the transfer is within the Rakaia-Selwyn or Selwyn-Waimakariri Combined Surface and Groundwater Allocation Zones:</u> -Only an A Block of groundwater allocation may be transferred in accordance with Policy 11.4.23; and -The water permit must have been exercised by the permit holder within the last five years. "	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Mr and Mrs Frank and Robyn Lamborn	52275	V1pLWRP-1137	Delete all restrictions in rules that don't allow transfers of water permits	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits

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McKavanagh Holdings Ltd	52276	V1pLWRP-1124	Delete all restrictions in rules that don't allow transfers of water permits	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Irrigation New Zealand Inc	52278	V1pLWRP-1083	Delete condition 3(c) and 4 from Rule 11.5.37 and amend condition 3(d) as follows: "... on the Planning Maps <u>unless it is within a farming enterprise</u> ; and	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Synlait Farms Ltd	52287	V1pLWRP-1223	Amend Rule 11.5.37 in line with submitter's proposed changes to Policy 11.4.22 on the transfer of water permits.	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Lake Ellesmere Dairy Farmers Group	52329	V1pLWRP-1043	Delete reference to 50% surrender (condition 4) when water permits are transferred. Surrender of water should be on a case by case basis included in the Policy (11.4.22) rather than a rule.	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Fonterra Co-operative Group Limited	52333	V1pLWRP-1342	Amend Rule 11.5.37 (4) as follows: 4. If the transfer is within the Rakaia-Selwyn or Selwyn-Waimakariri Combined Surface and groundwater Allocation Zones 50%-a <u>proportion</u> of the volume of transferred water <u>not exceeding 50%</u> is to be surrendered. Add an additional matter of discretion to rule 11.5.37 as follows: <u>7. The volume of the take to be surrendered</u>	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits
Waitikiri Gardens	52343	V1pLWRP-1085	Delete requirement to surrender transferred water or make discretionary	Support in Part	Transfer is an appropriate mechanism to ensure efficient allocation and use of water. Penalising the use of transfers by requiring surrenders is not an efficient and effective method and is inconsistent with the National Policy Statement for Freshwater Management which requires efficient allocation and use of water. It will limit the use of temporary transfer that could significantly increase the effectiveness of water use across water user groups and help farmers to manage within environmental limits

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
Irrigation New Zealand Inc	52278	V1pLWRP-1092	Delete Tables in Section 11.6, as the science used to derive is not technically robust, and replace with alternative table to be provided at the hearing.	Support	Tables 11 (a) and (b) need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Central Plains Water Ltd	52239	V1pLWRP-435	No specific decision requested. Central Plains seeks that the allocations be corrected to remove any errors and to ensure that they are reasonable.	Support	Tables 11 (a) and (b) need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Selwyn District Council	52245	V1pLWRP-536	Amend Table 11(a) to read: <u>"The following tables set out the fresh water outcomes to be achieved in the Selwyn-Waihora catchment. The achievement of these outcomes will be through a combination of implementation of this Plan along with the implementation of the recommendations of the Selwyn-Waihora Zone Implementation Plan. A number of the outcomes are aspirational and will only result through improvements to the current water quality being made over time and will likely take beyond the life of this plan to achieve."</u>	Support	Tables 11 (a) and (b) need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework. Improvements to water quality will require a number of methods and an intergenerational commitment.
Selwyn District Council	52245	V1pLWRP-538	No specific decision requested. Submitter seeks a review of the indicators in Table 11(a) so that they appropriately recognise the existing water quality values and existing activities occurring in the catchment.	Support	Tables 11 (a) and (b) need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Fish and Game Council North Canterbury	52310	V1pLWRP-711	Fish and Game seek clarification and may suggest alternative indicator levels to those proposed in the table.	Oppose	Tables 11 (a) and (b) need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.

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Medical Officer of Health, Canterbury District Health Board	52266	V1pLWRP-1245	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	Tables 11 (a) and (b) need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Medical Officer of Health, Canterbury District Health Board	52266	V1pLWRP-1240	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	Tables 11 (a) and (b) need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Selwyn District Council	52245	V1pLWRP-539	Submitter seeks a review of the indicators in Table 11(b) so that the appropriately recognise they existing water quality values and existing activities occurring in the catchment.	Support	Tables 11 (a) and (b) need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Fonterra Co-operative Group Limited	52333	V1pLWRP-1359	Submitter seeks the inclusion of a new method in Variation 1 committing the Council to monitor and review the effectiveness of the outcomes in Table 11(b) and associated rules, as well as non-regulatory methods, and to make adjustments to the outcomes on the basis on improved information.	Support in Part	Tables 11 (a) and (b) need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Dairy NZ	52271	V1pLWRP-1525	Include a new method in Variation 1 committing the Council to monitor and review the effectiveness of the outcomes in Table 11(b) and associated rules, as well as non-regulatory methods, and to make adjustments to the outcomes on the basis on improved information.	Support in Part	Tables 11 (a) and (b) need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Mrs Jane Demeter	52312	V1pLWRP-1015	Submitter seeks shorter timeframes for achieving the nutrient loads and water quality and quantity limits to limit	Oppose	Tables 11 (a) and (b) need to be reconsidered along with a revised s32 report informed by a scientific

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			the risk of not meeting NPS Freshwater Management requirements and Canterbury Water Management Strategy targets (timeframes not specified).		review and the attributes required to meet the proposed National Objectives Framework.
Irrigation New Zealand Inc	52278	V1pLWRP-1093	Delete Table 11(c) and (d), as the science used to derive is not technically robust and differ from those established through the recent consent review process, and replace with alternative table to be provided at the hearing.	Support	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Director General of Conservation	52225	V1pLWRP-218	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	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Central Plains Water Ltd	52239	V1pLWRP-384	The submitter seeks to delete Table 11(c) or amend it to include existing minimum flows on the relevant water bodies. The submitter identifies uncertainties in the effect of the Central Plains Water scheme on stream flows that could be addressed after the development of Central Plains. This could lead to a revised Table 11(c).	Support	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1288	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	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1324	Position on the data in Table 11 (c) reserved until Forest & Bird has had time to consider them in some detail and seek advice on the extent to which it can rely on them protecting the significant natural values within the Catchment.	Oppose	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Director General of Conservation	52225	V1pLWRP-219	Amend Policy 11.4.28 and associated Tables 11(c) and	Oppose	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			11(d) so that the flow and part restriction regime in the Tables is implemented as soon as possible once Variation 1 is operative.		the attributes required to meet the proposed National Objectives Framework.
Fish and Game Council North Canterbury	52310	V1pLWRP-688	No specific decision requested. Submitter seeks that the limits in Table 11(d) need further assessment as to their appropriateness in achieving the intent of the policy 11.4.28.	Oppose	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1289	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	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1325	Position on the data in Table 11 (d) reserved until Forest & Bird has had time to consider them in some detail and seek advice on the extent to which it can rely on them protecting the significant natural values within the Catchment.	Oppose	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Director General of Conservation	52225	V1pLWRP-248	Submitter seeks clarification that the limit is a target for the Selwyn-Waimakariri and Rakaia-Selwyn allocation zones in Table 11(e), and include a defined timeframe by which the target will be met to give effect to Policy B6 of the NPS Freshwater Management.	Oppose	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Fish and Game Council North Canterbury	52310	V1pLWRP-686	Submitter seeks that the limits in Table 11(e) need further assessment as to their appropriateness in achieving the intent of the policy 11.4.21.	Oppose	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Royal New Zealand Forest	52265	V1pLWRP-1290	Submitter seeks that limits set out in Tables 11 (e) are able to be reviewed within 5 years to ensure they continue to	Oppose	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
and Bird Protection Society			be appropriate and action can be taken if it is shown not to be the case.		the attributes required to meet the proposed National Objectives Framework.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1326	Position on the data in Table 11 (e) reserved until Forest & Bird has had time to consider them in some detail and seek advice on the extent to which it can rely on them protecting the significant natural values within the Catchment.	Oppose	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1327	Position on the data in Table 11 (f) reserved until Forest & Bird has had time to consider them in some detail and seek advice on the extent to which it can rely on them protecting the significant natural values within the Catchment.	Oppose	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1328	. Position on the data in Table 11 (g) reserved until Forest & Bird has had time to consider them in some detail and seek advice on the extent to which it can rely on them protecting the significant natural values within the Catchment	Oppose	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1329	Position on the data in Table 11 (h) reserved until Forest & Bird has had time to consider them in some detail and seek advice on the extent to which it can rely on them protecting the significant natural values within the Catchment.	Oppose	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Selwyn District Council	52245	V1pLWRP-541	Retain Table11 (i), particularly the targets relating to Community sewerage systems.	Oppose	The allocation be the same across the whole catchment to ensure equity for users.
Synlait Farms Ltd	52287	V1pLWRP-1016	Amend the nitrogen load limit for industrial and trade processes in Table 11(i) by adjusting the allocation above 106 tonnes to capture all consented discharges and	Support in Part	The allocation be the same across the whole catchment to ensure equity for users.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			allow for future growth in the zone.		
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1330	Position on the data in Table 11 (i) reserved until Forest & Bird has had time to consider them in some detail and seek advice on the extent to which it can rely on them protecting the significant natural values within the Catchment	Oppose	The tables need to be reconsidered along with a revised s32 report informed by a scientific review and the attributes required to meet the proposed National Objectives Framework.
Synlait Farms Ltd	52287	V1pLWRP-1219	Amend Table 11(i) to ensure the allocation of nitrogen to community and sewerage systems is accurate and reflects the waste disposed of to land from emptying on-site domestic wastewater facilities. Clarify whether it should or should not cover domestic sludge from vacuum tanker operators and any allocation to seepage pits within the catchment.	Support in Part	The allocation be the same across the whole catchment to ensure equity for users.
Lake Ellesmere Dairy Farmers Group	52329	V1pLWRP-1050	Submitter questions the nitrogen loading limit of 95% coming from farming activities and only 5% from urban, industrial and trade discharges to land	Support in Part	The allocation be the same across the whole catchment to ensure equity for users.
Fonterra Co-operative Group Limited	52333	V1pLWRP-1224	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	Support in Part	The allocation be the same across the whole catchment to ensure equity for users.

Submitter Name	Submitter ID	Sub point ID	Var 1 Plan Provision and decision requested by submitter	Support/ Oppose	Reason
			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).		
Mrs Susan Thornley	52180	V1pLWRP-68	Delete specific limits in Table 11(j) or alternatively amend Table 11(J) to state "or other figures as can be reasonably and accurately calculated by improved modelling or other approved calculation techniques	Support in Part	The allocation be the same across the whole catchment to ensure equity for users.
Royal New Zealand Forest and Bird Protection Society	52265	V1pLWRP-1331	Position on the data in Table 11 (j) reserved until Forest & Bird has had time to consider them in some detail and seek advice on the extent to which it can rely on them protecting the significant natural values within the Catchment.	Oppose	The allocation be the same across the whole catchment to ensure equity for users
Ellesmere Irrigation Society Inc	52210	V1pLWRP-922	Delete all proposed changes to Schedule 7.	Support	GMPNOLR is not known and the effects have not been assessed. Therefore it is inappropriate to include these within Variation 1. Further reductions are predicated on the reductions using GMPNPLR. Reductions post 2022 need to be reassessed when the impact of GMPNPLR are known.
Dunsandel Groundwater Users Group	52221	V1pLWRP-343	Delete the proposed addition to Schedule 10 that within the Selwyn-Waihora catchment method 1 shall determine seasonal irrigation demand based on eight and a half years out of ten.	Support	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.

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Bowden Environmental	52242	V1pLWRP-598	Delete the change to Schedule 10 (8.5 years out of 10).	Support	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.
Ellesmere Irrigation Society Inc	52210	V1pLWRP-923	Delete all proposed changes to Schedule 10.	Support	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.
Erralyn Farm Ltd & Krysette Ltd	52263	V1pLWRP-1443	Delete the proposed addition to Schedule 10 - Reasonable Use Test	Support	The eight and a half out of ten year reliability is insufficient for horticultural production. The policy and method should be amended to a reliability factor of nine years out of ten, consistent with the Land and Water Plan.