

## Morag Hamilton

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**From:** Sarah Drummond <sarah.drummond@ecan.govt.nz>  
**Sent:** Friday, 30 January 2015 1:57 p.m.  
**Subject:** FW: Variation 2: Further Submission by Central South Island Fish and Game Council  
**Attachments:** MAB-264450-57-21-V10 (Further submission on Variation 1 to the LWRP).pdf

[Further Submission for trimming please.](#)

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**From:** Maree Baker-Galloway [<mailto:maree.baker-galloway@andersonlloyd.co.nz>]  
**Sent:** Friday, 30 January 2015 1:38 p.m.  
**To:** Mailroom Mailbox  
**Cc:** Sarah Drummond  
**Subject:** Variation 2: Further Submission by Central South Island Fish and Game Council

Please find attached for lodging a further submission in respect of the following submitters:

1. Director General of Conservation ID 53688
2. NZ Pork ID 52107
3. Irrigation NZ Inc ID 52278
4. Beef and Lamb NZ Ltd ID 56727
5. Nga Rūnanga and Te Rūnanga O Ngāi Tahu ID 52233
6. Synlait Milk Ltd ID 54491
7. Hinds Plains Land and Water Partnership ID 56730
8. Horticulture NZ ID 52267
9. Fonterra Co-operative Group Ltd ID 52333
10. Dairy Holdings Ltd ID 53683
11. Ravensdown Fertiliser Co-operative Ltd ID 56708
12. Fertiliser Association of New Zealand ID 56725
13. Dairy NZ ID 52271
14. Rangitata Diversion Race Management Ltd ID 56706
15. Barrhill Chertsey Irrigation Scheme ID 56731
16. Eiffelton Community Group Irrigation Scheme Inc ID 56799
17. Longbeach Estate Ltd ID 56641
18. Federated Farmers Combined ID 51457
19. Mayfield Hinds Irrigation Ltd ID 56712
20. Hydrotrader ID 54907

Please acknowledge receipt, and advise if you require a hard copy.

Please also note both myself, and Central South Island directly, as addresses for service.

Yours faithfully

Maree Baker-Galloway

**Maree Baker-Galloway**  
**Partner**



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## Further Submission on Proposed Variation 2 to the Canterbury Land and Water Regional Plan

To: Variation 2 to the Proposed Canterbury Land and Water Regional Plan  
Environment Canterbury  
Freepost 1201  
P O Box 345  
Christchurch

Submitters Name: Central South Island Fish and Game

Address for service: Jay Graybill  
Chief Executive  
Central South Island Fish and Game  
32 Richard Pearse Drive  
P O Box 150  
Temuka 7948  
Email: [jgraybill@fishandgame.org.nz](mailto:jgraybill@fishandgame.org.nz)

1. This further submission is filed by Central South Island Fish and Game in response to submissions made in respect of Proposed Variation 1 to the Canterbury Land and Water Regional Plan. The further submissions are outlined in Annexure 1.
2. Central South Island Fish and Game represent a relevant aspect of the public interest; and have an interest in the proposal greater than the interest the general public has.
3. Central South Island Fish and Game wishes to be heard in support of its submission and if others make a similar submission would consider presenting a joint case with them at the hearing.



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Jay Graybill  
Chief Executive  
Central South Island Fish and Game

Dated 30 January 2015

### ANNEXURE 1

Submitter	Sub ID	Parts of the submission supported or opposed	Reasons	Support / Oppose
Director General of Conservation	53688	V2 pLWRP-459	Inclusion of management methods to achieve the Freshwater objectives of the CLWRP, Variation 2 and the Hinds catchment and ZIP solutions package in the Hinds/Hekeao Plains which promote the sustainable management of natural resources	Support
Director General of Conservation	53688	V2 pLWRP-416	Inclusion of further wording to the introductory text of variation 2 is required to better reflect the significant natural resource management issues faced by the catchment and which the variation 2 should address in sustainably managing its natural resources	Support
Director General of Conservation	53688	V2 pLWRP-417	Inclusion of recommended definitions and amendments to the groundwater definition is required to ensure that variation 2 is a comprehensive, and implementable document, which is readily understood by the community.	Support
Director General of Conservation	53688	V2 pLWRP-430	As proposed variation 2 failed to adequately recognise and provide for the sustainable management of wetlands, protection of wetland habitats, wetland creation, or the identification and protection of the outstanding values of wetlands including biodiversity values. Inclusion of new policy as proposed by DOC is required to give effect to NPSFWM 2014 and RMA in regards to the sustainable management of wetlands	Support
Director General of Conservation	53688	V2 pLWRP-419	Amended wording is required to ensure terminology is scientifically correct	Support
Director General of Conservation	53688	V2 pLWRP-423	Amendment sought is more appropriate.	Support
Director General of Conservation	53688	V2 pLWRP-451	Amendments sought provide greater protection for native and salmonid fish and as such give better effect to the part II of the Act and the NPSFWM 2014	Support
Director General of Conservation	53688	V2 pLWRP-458	Is required to ensure that the Regional Council retains control over the rate and volume of water discharged in order to ensure the sustainable management of natural resources including the adherence to limits and	Support

			measures to avoid / remedy/ or mitigation adverse effects on the environment	
Director General of Conservation	53688	V2 pLWRP-1251	Amendment is required to ensure that monitoring locations are appropriate in order to ensure the sustainable management of the resource	Support
Director General of Conservation	53688	V2 pLWRP-460	Inclusion of target dates is required to give effect to the NPSFWM and ensure a trajectory of improvement towards the Freshwater limit over time.	Support in part
NZPork	52107	V2 pLWRP-118	Reference to controlling phosphorous losses should be maintained in order to give effect to the RPS and NPS Freshwater Management	Oppose
Irrigation New Zealand Inc	52278	V2 pLWRP-170	More that good management practices is required to give effect to the RPS and the NPS Freshwater Management	Oppose
Beef +Lamb New Zealand Limited	56727	V2 pLWRP-230	Application of land use capability to allocate discharge allowances promotes the sustainable management of soil and water resources. Amendments sought give effect to the purpose of the Act and NPSFWM 2014 and promote efficient use of natural resources	Support in part
Nga Rūnanga and Te Rūnanga O Ngāi Tahu	52233	V2 pLWRP-201	Amendments sought are consistent with the environment court decision on Horizons One Plan, Board of Inquiry decision on Ruataniwha, and the direction the government will be taking in regards to stock in waterways. The exclusion of stock from waterbodies is a fundamental bottom lines when it comes to sustainable management of land uses and soil and water.	Support in part
Synlait Milk Ltd	54491	V2 pLWRP-233	Amendments sought propose to decrease nitrogen load to 70% of current loads.  The Hinds catchment is currently significantly degraded such that the life supporting capacity of freshwater and ecosystem health is not being provided for nor protected.  Significant reductions in contaminant losses from land such as phosphorus, nitrogen, and faecal material will be required to halt ongoing degradation and improve the health of freshwater such that it restores its life supporting capacity and ecosystem health.	Support in part

			Gives effect to purpose of the Act and NPSFWM.	
Hinds Plains Land and Water Partnership	56730	V2 pLWRP-298	<p>Loads should be calculated using the best available methods and tools and should correspond with desired instream nutrient concentrations which are required to achieve the Freshwater Objectives, purpose of the Act, and to give effect to the NPSFWM and the RPS.</p> <p>In order to enable the efficient and sustainable use of natural resources, and to ensure that 'gaming' does not occur, tools such as OVERSEER should be applied in a consistent way</p>	Support in part
Synlait Milk Ltd	54491	V2 pLWRP-234	<p>Proposed amendments seek to reduce nitrogen losses from those properties leaching greater than 20kgN/ha/yr and to achieve a 70% reduction in Nitrogen load in the lower catchment.</p> <p>Changes sought by the submitter will give better effect to the RMA and NPSFWM 2014 than those notified. However, the degree to which the purpose of the Act and the requirements of the NPSFWM are met will depend on the timeframes set for achieving the reduction in N leaching, and the allocation of nitrogen leaching rates on a per hectare basis, along with the allocation methodology applied.</p>	Supported in part
Synlait Milk Ltd	54491	V2 pLWRP-234	Submitter proposes inclusion of provision d. Given the already significant overallocated state of the catchment, further intensification would be inconsistent with the purpose of the Act and the NPSFWM 2014.	Oppose
Synlait Farms Ltd		V2 pLWRP-994	Proposals to reduce Nitrogen leaching by 74% of the existing catchment load are supported. Achievement of significant reductions in leaching and loads will better met the purpose of the Act and give effect to the NPSFWM	Support in part
Nga Rūnanga and Te Rūnanga O Ngāi Tahu	52233	V2 pLWRP-274	Provisos proposed better reflect conditions to ensure that the adverse effects of the activity are avoided	Support in part
Beef +Lamb New Zealand Limited	56727	V2 pLWRP-231	The amendments sought by Beef and Lamb best meet the requirements of the Act in promoting the sustainable and efficient management of land, soil and water resources, and give effect to the NPSFWM 2014.	Support

Hinds Plains Land and Water Partnership	56730	V2 pLWRP-286	<p>Amendments proposed are unnecessary, and incur unreasonable cost and delay.</p> <p>The issue that this submission is trying to address can be addressed in alternative ways which do not incur unreasonable costs and delay in plan /rule implementation. Such amendments include that OVERSEER is run by an accredited and experienced practitioner, and that standard input protocols which reflect actual farm management practices are applied. Validation testing can be undertaken when new versions of the model (such as OVERSEER) occur, such that the trajectory of decreasing N leaching from the farming property is realised and not just a figment of changes in the model.</p>	Oppose
Horticulture New Zealand	52267	V2 pLWRP-640	Nutrient trading is supported. Trading systems allow the most efficient use of natural resources and so promote sustainable management, as long as the load limits (targets) are being achieved and where overallocation exists it is still being phased out.	Supported
Fonterra Co-operative Group Limited	52333	V2 pLWRP-799	Fails to consider cumulative effects.	Oppose
Dairy Holdings Ltd	53683	V2 pLWRP-999	Fails to consider cumulative effects.	Oppose
Dairy Holdings Ltd	53683	V2 pLWRP-1000	Fails to consider cumulative effects.	Oppose
Dairy Holdings Ltd	53683	V2 pLWRP-1007	Fails to control adverse effects.	Oppose
Irrigation New Zealand Inc	52278	V2 pLWRP-186		Oppose
Dairy NZ	52271	V2 pLWRP-570	Fails to control adverse effects.	Oppose
Nga Rūnanga and Te Rūnanga O Ngāi Tahu	52233	V2 pLWRP-211	Controlled activity status along with conditions to manage sediment phosphorus and faecal matter are supported and better reflect sustainable management than the rule as notified	Supported in part
Fonterra Co-operative	52333	V2 pLWRP-784	Fails to control adverse effects.	Oppose

Group Limited				
Irrigation New Zealand Inc	52278	V2 pLWRP-188	Fails to give effect to the purpose of the RMA or the NPSFWM 2014.  Does not ensure that water quality and load limits are met or not exceeded.	Oppose
Nga Rūnanga and Te Rūnanga O Ngāi Tahu	52233	V2 pLWRP-215	Amendments seek to achieve set reductions in nitrogen leaching over time in order to achieve nutrient load limits. Amendments sought also better provide for the targeted and sustainable management of land so as to address impacts of sediment, and phosphorus contaminant discharges.  Amendments better reflect the purpose of the Act and give effect to the NPSFWM than the rule as notified	Support in part
Horticulture New Zealand	52267	V2 pLWRP-627	Amendments sought fail to give effect to the purpose of the Act or the NPSFWM 2014.	Oppose
Ravensdown Fertiliser Co-operative Limited	56708	V2 pLWRP-748	Amendments sought fail to give effect to the purpose of the Act or the NPSFWM 2014.	Oppose
Fertiliser Association of New Zealand	56725	V2 pLWRP-827	Amendments sought fail to give effect to the purpose of the Act or the NPSFWM 2014.	Oppose
Nga Rūnanga and Te Rūnanga O Ngāi Tahu	52233	V2 pLWRP-216	Meets the purpose of the Act and gives effect to the NPSFWM 2014	Support
Horticulture New Zealand	52267	V2 pLWRP-628	Amendments sought fail to give effect to the purpose of the Act or the NPSFWM 2014.	Oppose
Dairy NZ	52271	V2 pLWRP-576	Amendments fail to provide for the phasing out of existing over allocation or the achievement of nutrient loads and limits, and ultimately the freshwater objectives of the CLWRP or Variation 2.  Amendments sought fail to give effect to the purpose of the Act or the NPSFWM 2014.	Oppose
Rangitata Diversion Race Management Limited	56708	V2 pLWRP-653	Amendments fail to provide for the phasing out of existing over allocation or the achievement of nutrient loads and limits, and ultimately the freshwater objectives of the CLWRP or Variation 2.	Oppose

			Amendments sought fail to give effect to the purpose of the Act or the NPSFWM 2014.	
Ravensdown Fertiliser Co-operative Limited	56708	V2 pLWRP-757	The submitter recommends the deletion of table 13(h) or the withdrawal of variation 2 until the GMP leaching numbers are derived. This submission is supported.  Reliance on as yet undetermined leaching figures means the s32 evaluation of efficiency and effectiveness is not able to be undertaken, and corresponding findings as to whether or not it to give effect to the purpose the NPSFWM 2014 and meets the purpose of the Act cannot be made.	Support in part
Irrigation New Zealand Inc	52278	V2 pLWRP-193	Amendments sought fail to give effect to the purpose of the Act or the NPSFWM 2014.	Oppose
Barrhill Chertsey Irrigation Scheme	56731	V2 pLWRP-529	Amendments sought fail to give effect to the purpose of the Act or the NPSFWM 2014	Oppose
Dairy NZ	52271	V2 pLWRP-585	fails to consider cumulative effects, and control adverse effects.	Oppose
Dairy NZ	52271	V2 pLWRP-586		Oppose
Eiffelton Community Group Irrigation Scheme Inc	56799	V2 pLWRP-1057	The submitter proposes the inclusion of table which sets 'reasonable' use for various animals. S14 requirements in regards to ensuring that takes and uses of water are reasonable are discussed above. This is supported.	Supported in part
Eiffelton Community Group Irrigation Scheme Inc	56799	V2 pLWRP-1059	Fails to consider cumulative effects and control adverse effects.	Oppose
Longbeach Estate Ltd	56641	V2 pLWRP-1133	Fails to consider cumulative effects and control adverse effects.	Oppose
Federated Farmers Combined	54457	V2 pLWRP-1377	Submission requests the load limits and N discharge rates be reviewed. This is supported.  N load limits and discharge rates and reductions should be linked to limits required to achieve instream water quality concentrations which will	Support

			safeguard the life supporting capacity and ecosystem health of freshwater and achieve the freshwater objectives	
Mayfield Hinds Irrigation Limited	56712	V2 pLWRP-369	Is contrary to the purpose of the Act and fails to give effect to the NPSFWM.	Oppose
Federated Farmers Combined Canterbury Water Users	51457	V2 pLWRP-378	Is contrary to the purpose of the Act and fails to give effect to the NPSFWM.	Oppose
Irrigation New Zealand Inc	52278	V2 pLWRP-205	Is contrary to the purpose of the Act and fails to give effect to the NPSFWM.	Oppose
Horticulture NZ	52267	V2 pLWRP-608	Does not promote efficient and effective use of resources, nor appropriately assess costs and benefits.	Oppose
Horticulture NZ	52267	V2 pLWRP-604	No consideration of adverse effects.	Oppose
Hydrotrader	53907	V2 pLWRP-158	Transfers of surface/groundwater consents within over-allocated zones should remain prohibited until limits are met.	Oppose
Horticulture NZ	52267	V2 pLWRP-621	Any flow sharing regime is an important component of adequately managing the competing instream and out of stream demands. It is not reasonable or fair to exempt a certain landuse from the requirements of the flow regime.	Oppose
Federated Farmers	51457	V2 pLWRP- 379	Changes to the flow and allocation regime are required to address identified issues in the catchment and give effect to the Variation and the CLWRP.	Oppose