

## Morag Hamilton

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**From:** Nigel Bryce <n.bryce@ryderconsulting.co.nz>  
**Sent:** Friday, 30 January 2015 3:37 p.m.  
**To:** Mailroom Mailbox  
**Cc:** Ben (ben@rdrml.co.nz); Gavin Kemble; Bridgette Malcon  
**Subject:** TRIM: Variation 2 - Proposed Land & Water Regional Plan - Further Submissions - Rangitata Diversion Race Management Limited  
**Attachments:** RDRML Further Submissions to Variation 2 Proposed Canterbury Land and Water Regional Plan.pdf; ATT00001.htm; PastedGraphic-1.tiff; ATT00002.htm; facebook\_icon.png; ATT00003.htm; linkedin\_icon.png; ATT00004.htm

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged



Rangitata Diversion Race Management Limited

30<sup>th</sup> January 2015

Further Submissions on Variation 2 - Proposed Land & Water Regional Plan (September 2014)  
Environment Canterbury  
PO Box 345  
**CHRISTCHURCH 8140**

**By e-mail:** mailroom@ecan.govt.nz

Dear Sir/Madam,

**FURTHER SUBMISSIONS – VARIATION 2 PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN**

This letter supports the further submissions from Rangitata Diversion Race Management Limited ('RDRML') to proposed Variation 2 - Canterbury Land and Water Regional Plan.

The Company has made a number of further submissions, which are attached within Table 1A attached to this covering letter.

Please do not hesitate to contact myself, or Nigel Bryce (of Ryder Consulting Limited) should you wish to discuss these further submissions.

Yours Faithfully

**Rangitata Diversion Race Management Limited**

A handwritten signature in black ink, appearing to be 'Ben Curry', written over a horizontal line.

Ben Curry  
*Chief Executive Officer*

**TABLE 1A - RANGITATA DIVERSION RACE MANAGEMENT LIMITED SUBMISSION TO VARIATION 2 - PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN**

**Table 1A – Further Submissions to Variation 2 to the Canterbury Land and Water Regional Plan  
Rangitata Diversion Race Management Limited (lodged 30/01/2015)**

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L & WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
New Zealand Pork Industry / 52107	V2 pL WRP-124	Reference to 'good management practice' within the plan.	Reference to good management practice is strongly supported as a tool for managing nutrient loss, however it is not reasonable to include 'good management practice' within the plan until it has been defined / quantified. Thus the submitter has suggested deletion of the same until the outcomes from the Matrix of Good Management Project are known.	Oppose	The Rangitata Diversion Race Management Limited ('RDRML') seeks that the submission point be <b>disallowed</b> for the following reasons:  Determining when a farm is operating at 'good management practice' is central to determining what the 'good management practice nitrogen rate' is. As a consequence, the Company considers that an alternative response to should still be provided for.  RDRML sought to define 'good management practice' as per RDRML's primary submission (Submission Point ID V2 pL WRP-620) as follows:  <i>"means the implementation of the measures and practices set out in Schedule 24b – Good Management Practices"</i> .  The Company sought to complement this relief with a new schedule entitled '24b – Good Management Practices' is created and populated with the detail as set out in Annexure B of RDRML's primary submission.
Barrhill Chertsey Irrigation Scheme / 56731	V2 pL WRP-475	13.1A: Definitions 'baseline land use'	Definition of 'baseline land use' is unclear, especially as it applies to irrigation schemes and farming enterprises. As such the submitter requests that the definition is amended to expressly contemplate farming enterprises and irrigation schemes, remedy the current issues around rules 5.46 and 5.62, ensure that the consented BCI scheme is protected and ensure that the nitrogen baseline still enables compliance to be measured against the highest annual N-loss in the period in 2009 – 2013.	Support	The RDRML seeks that the submission point be <b>allowed</b> for the following reasons:  The definition of 'baseline land use' is not clear whether it incorporates an operating unit as a whole as referenced within the definition of 'farming enterprise'. RDRML considers that, for consistency of interpretation and application of the definition, the definition should be amended to explicitly recognise and provide for the consideration of an operating unit as a whole, which may include land held in several Certificates of Title and in multiple ownership.
Barrhill Chertsey Irrigation Scheme / 56731	V2 pL WRP-535	New rule to recalculate N loss limit/load in the event of OVERSEER updates.	Rule should be provided to the effect that if OVERSEER is updated, the most recent version can be used to recalculate N loss limit/load described in a plan provision and assess compliance against the recalculated N loss limit/load.	Support (in part)	The RDRML seeks that the submission point be <b>allowed</b> as it relates to the provision for updates in OVERSEER to be incorporated and the latest version be used to determine N loss limit/load.  RDRML supports (in principle) the submitter's intention to provide for a method where OVERSEER is updated, however, the Company reserves its position on this relief until such time as a more comprehensive rule framework is provided for.
Barrhill Chertsey Irrigation Scheme / 56731	V2 pL WRP-536	New Rule	Add a new rule/provisions to ensure that where a property is part of an irrigation scheme it shall be limited a proportional basis (by volume) to the amount of water supplied by the scheme.	Support (in part)	The RDRML seeks that the submission point be <b>allowed</b> for the following reasons:  RDRML supports (in principle) the submitter's intention to provide for a new method to provide for this situation, however, the Company would like to consider a more detailed policy and rule framework and the implications of the same.

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L& WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
N Stoddart Limited / 56756	Not recorded in the summary table	Policies 13.4.18 and 13.4.19	Opposes Policies 13.4.18 and 13.4.19 and seeks that the reference to the date of the '30 June 2020' in Policy 13.4.18 be deleted and read from "...table 13(e) until there is a collaboratively developed flow and allocation regime that has been included in the plan through a Schedule 1 RMA process".  The submitter notes that the new flow and allocation regime will seek to accommodate those that still use water from the drains, will reflect those who wish to surrender their surface consents, those who can successfully transfer to groundwater and will reflect an intention to share additional flows (as a result of TSA and/or MAR in the surface water bodies so that in-stream values can be enhanced and existing water uses, maintained. The submitter further suggests that Policy 13.4.19 be deleted.	Support (in part)	The RDRML seeks that the submission point be <b>allowed</b> as it relates to the deletion of the date '30 June 2020' in Policy 13.4.18 for the following reasons:  The Company has received advice, that it would be better to extend this date to 2035, as that will achieve the ecological and broader environmental improvements that are sought, while not causing unacceptable social and economic consequences.
Synlait Milk Limited / 54491	V2 pLWRP-1255	13.1A: Definitions – new 'nitrogen definition baseline'	The definition of the nitrogen baseline is contained in the Proposed Canterbury Land & Water Regional Plan (section 2.9). Since the decisions were released and issue has been identified between the baseline and the four-year rolling average nitrogen loss calculation. The submitter notes that ECan has recognised this issue and published implementation guidance on how to transition to the new baseline approach.  The submitter notes that while they accept that it isn't ideal to have a different definition from the Proposed Canterbury Land & Water Regional Plan and its sub-regional chapters, it isn't appropriate to continue imposing a definition that is recognised as being problematic.	Support	The RDRML seeks that the submission point be <b>allowed</b> for the following reasons:  If the definition of 'nitrogen baseline' is proving problematic in its interpretation and application, then this should be addressed through the inclusion of a clear and concise definition within the pL&WRP that addresses the current interpretation issues.
Synlait Milk Limited / 54491	V2 pLWRP-235	Policy 13.4.14	Supports the enabling of MAR and TSA as methods to achieve outcomes sought by the zone committee. However, the submitter notes that there are potentially significant adverse effects on landowners and communities in terms of rising groundwater levels and that proposals for such schemes must be carefully assessed before being approved and there must be a mechanism for mitigation measures/recourse if unforeseen adverse effects do occur. As such, the submitter requests amendments in line with the same.	Support (in part)	The RDRML seeks that the submission point be <b>allowed</b> for the following reasons:  RDRML supports (in principle) the need to consult with potentially affected people as part of MAR and TSA methods, however, the Company wishes to ensure that this consultation does not constrain or reduce the effectiveness of these or other methods applied to the Hinds Drains district to be applied in a timely manner and to be able to respond to the resource management issues raised.
Synlait Milk Limited / 54491	V2 pLWRP-255	Rule 13.5.18	The use of land for a farming activity as part of a farming enterprise in the Lower Hinds/Hekeao Plains Area is a restricted discretionary activity, provided the following conditions are met: Add matters of discretion: 1. The content of the Farm Environment Plan; and Existing nitrogen and phosphorus management practices to reduce nitrogen loss; and 2. Existing nitrogen and phosphorus management practices to reduce nitrogen loss; and 3. The nitrogen load target for farming activities; and 4. The potential benefits of the activity to the applicant and the community and the environment.	Support	The RDRML seeks that the submission point be <b>allowed</b> for the following reasons:  The RDRML supports (in principle) a restricted discretionary activity status for farming enterprise activity within the Lower Hinds/Hekeao Plains area subject to appropriate matters of discretion.
Te Runanga o	V2 pLWRP-181	New Objective	Seeks the addition of a new catchment Objective:	Oppose	The RDRML seeks that the submission point be <b>disallowed</b> for the

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L&WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
Arowhenua and Te Runanga o Ngai Tahu / 52233			"The freshwater resources of the Hinds/Hekeao catchment support a prosperous land-based economy; and water quality and flows in the Upper Hinds/Hekeao Plains Area are maintained and in the lower Hinds/Hekeao Plains Area they are improved. Ngai Tahu is able to exercise kaitiakitanga in the Hekeao/Hinds catchment."		following reasons: The freshwater objectives in Section 3 of the pL&WRP provide the narrative outcomes sought to be achieved for, or from, fresh water across the whole of the Canterbury region. As a consequence, we do not consider it appropriate or indeed necessary to introduce objectives into this sub-regional section, given that the relief sought is already embodied within Section 3 of the L&WRP.
Te Runanga o Arowhenua and Te Runanga o Ngai Tahu / 52233	V2 pL WRP-183	New Policy	Seeks the addition of a new policy: "Recognise the cultural significance of the Hekeao/Hinds River to Ngai Tahu and enable Ngai Tahu to exercise kaitiakitanga and mahinga kai in the catchment through: - Continual improvement in the flows in lowland streams and springs over time; - Continual reductions in the concentrations of nitrogen in groundwater over time; - Minimising the potential discharge of contaminants into water through land use practices, riparian management, and waterway and drain maintenance; and - Encouraging the protection or restoration of natural wetland areas and other mahinga kai."	Oppose	The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons: The freshwater Objectives 3.1 and 3.2 and Policy 4.5 in Section 3 of the pL&WRP already provide matters of cultural significance sought by the submitter, and wider range of policy outcomes expressed within the L&WRP seek to achieve the relief sought by this submitter. We do not consider that the addition of this policy is necessary to achieve the relief sought by the submitter.
Te Runanga o Arowhenua and Te Runanga o Ngai Tahu / 52233	V2 pL WRP-196	Policy 13.4.9	Seeks the deletion of Policy 13.4.9 and replace with the following: "Improve the overall water quality in the Hinds/Hekeao Catchment by: (a) Minimising the potential of any land use to discharge contaminants to water by adopting the good management practices listed in Schedule 24a; (b) Reducing the amount of sediment, phosphorous and microbial contaminants entering water through the use of Farm Environment Plans and excluding stock from waterways; (c) In the Upper Hinds/Hekeao Plains Area, maintaining current low levels of dissolved nitrogen concentrations in water by avoiding new land uses with estimated N losses that exceed the levels for the A Band limit set out in Table XX; and (d) In the Lower Hinds/Hekeao Plains Area reducing the concentrations of dissolved nitrogen in water by limiting the amount of N loss that can occur through changes in land use which exceed the A Band limits set out in Table XX; and requiring a reduction in N losses from existing land uses that exceed the B Band limit in accordance with Policy 13.4.10 (b)."	Oppose	The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons: The Submitter's proposed policy 13.4.9 (c) and (d) link back to the Submitters proposed Table XX, which seeks to remove the current grand-parenting approach adopted within V2 and replacing this with Table XX. This approach relies on arbitrary limits within the B and C Bands set out in Table XX and/or as specifically referenced in amended policy framework sought.
Te Runanga o Arowhenua and Te Runanga o Ngai Tahu / 52233	V2 pL WRP-199	Policy 13.4.10	Seeks the deletion of Policy 13.4.10 and replace with the following: (a) By 01 July 2016 include by way of a plan change a schedule of	Oppose	The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L&WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
Tahu / 52233			<p>reasonable N loss rates for farm activities on soil types when working to good management practice; and a schedule of requirements for N reductions for existing land uses which have N loss estimates in Overseer which exceed the B band limit (27kg/ha/yr).</p> <p>(b) By 01 July 2017 require:</p> <p>(i) All land uses which have nitrogen loss calculations above the A Band limit to reduce their N losses to no more than the applicable number for good management practice set out in the schedule under policy 13.4.10 (a); and</p> <p>(ii) Require existing land uses whose nitrogen loss calculation are higher than 27kg/ha/yr as set out in the B Band in Table XX to implement a nitrogen reduction plan to reduce N losses as required in the schedule introduced under Policy (a) above; OR</p> <p>If no such schedules exist, require all existing land uses with nitrogen loss calculations that exceed the A Band limit to adopt best practicable option to minimize N losses.</p>		<p>The Submitter's proposed policy 13.4.10 links back to the submitter's proposed Table XX, which seeks to remove the current grand parenting approach adopted within V2 and replacing this with Table XX.</p> <p>This approach relies on arbitrary limits within the A Band set out in Table XX and/or as specifically referenced in amended policy framework sought.</p>
Te Runanga o Arowhenua and Te Runanga o Ngai Tahu / 52233	V2 pLWRP-241	Policy 13.4.13	<p>Seeks the deletion of Policy 13.4.13(c) and seeks its replacement with the following:</p> <p>"(c) enabling, by way of resource consent process, land use intensification or changes in land use on a maximum of 30,000 hectares of land, provided the nitrogen loss calculation is limited to no more than 27 kg per hectare per year.</p> <p>Provide opportunities for changes in land use and associated increases in N loss above the A Band limits in the Lower Hinds/Hekeao Plains Area up to a maximum estimated nitrogen loss limit of 27kgN/ha/yr and a total cap of 214t N/yr; and require new land uses applying for N losses in this B band to be operating at best management practice from the outset.</p> <p>Allow N loss to be managed by irrigation schemes and principal water suppliers on behalf of their shareholders provided:</p> <p>(a) For any irrigation scheme or principal water supplier that exists as at 27th September 2014 the N loss calculation for the total area shall be based on adopting best practicable option to mitigate N loss from the land uses occurring as at 27th September 2014; and once the N reduction schedule is put in place in accordance with Policy 13.4.10 (a) the N loss totals shall be reviewed to ensure compliance with the N reduction requirements.</p> <p>(b) For any irrigation scheme or principal water supplier established after 27th September 2014 the N loss calculation for the total area shall not exceed the N load limits for new land uses in</p>	Oppose	<p>The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:</p> <p>The Submitter's approach relies on the arbitrary limits, including the 27kgN/ha/yr, which the RDRML has sought to advance an alternative methodology for (set out in Annexure C to the Company's Primary Submission).</p> <p>The RDRML notes that the rate of 27 kgN/ha/yr has been derived using a methodology and approach developed and proposed by Macfarlane Rural Business Limited (hereafter referred to as 'MRB'). The Company understands that when applied in the 'Central Plains' (of Canterbury) the MRB methodology and approach has predicted discharge rates that have been found to be, approximately, 25% below the actual discharges. It also understands that MRB is now applying revised a methodology and approach that results in higher rates (than those it previously estimated) being produced.</p> <p>The RDRML considers that reference to the N losses not exceeding 27 kilograms per hectare per annum is, therefore, inappropriate on the basis that it was not derived using an appropriate methodology.</p>

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L&WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons															
Te Runanga o Arowhenua and Te Runanga o Ngai Tahu / 52233	V2 pL WRP-206	13.5 - Rules	<p><i>Band B of Table XX."</i></p> <p>Seeks the deletion of the rules for grand parenting N losses [Grand parenting Rules (refers to baseline) - 13.5.8, 13.5.9, 13.5.10, 13.5.12, 13.5.13, 13.5.15, 13.5.16, 13.5.17, 13.5.18 and 13.5.20] and replace with N loss limits to meet the catchment load and replace with table of N limits or bands as describe below:</p> <p><b>Table XX</b></p> <table border="1" data-bbox="459 1003 839 1496"> <thead> <tr> <th>Band</th> <th>Limit</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>A - Upper Hinds/Hekeko Plains Area</td> <td>Up to 10kgN/ha/yr</td> <td>Permitted activity</td> </tr> <tr> <td>A - Lower Hinds/Hekeko Plains Area</td> <td>Up to 15kgN/ha/yr</td> <td>Permitted activity</td> </tr> <tr> <td>B - Lower Hinds Hekeko Plains Area</td> <td>&gt;15kgN/ha/yr - 27 kgN/ha/yr And if land use established after 27<sup>th</sup> Sept 2014 - maximum cap of 214 t/yr</td> <td>Restricted activity discretionary</td> </tr> <tr> <td>C - all areas</td> <td>Over 27kgN/ha/yr</td> <td>Discretionary If activity is established before 27<sup>th</sup> Sept 2014 or if activity changes but no increase in nitrogen loss calculation. Prohibited if activity is established after 27<sup>th</sup> Sept 2014.</td> </tr> </tbody> </table> <p>Or such other limits as determined by soil type and land use modelling considering the total catchment loads for N set out in Variation 2.</p>	Band	Limit	Status	A - Upper Hinds/Hekeko Plains Area	Up to 10kgN/ha/yr	Permitted activity	A - Lower Hinds/Hekeko Plains Area	Up to 15kgN/ha/yr	Permitted activity	B - Lower Hinds Hekeko Plains Area	>15kgN/ha/yr - 27 kgN/ha/yr And if land use established after 27 <sup>th</sup> Sept 2014 - maximum cap of 214 t/yr	Restricted activity discretionary	C - all areas	Over 27kgN/ha/yr	Discretionary If activity is established before 27 <sup>th</sup> Sept 2014 or if activity changes but no increase in nitrogen loss calculation. Prohibited if activity is established after 27 <sup>th</sup> Sept 2014.	Oppose	<p>The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:</p> <p>The Submitter's approach relies on the arbitrary limits, including the 27kgN/ha/yr, which the RDRML has sought to advance an alternative methodology for (set out in Annexure C to the Company's Primary Submission).</p> <p>The RDRML notes that the rate of 27 kgN/ha/yr has been derived using a methodology and approach developed and proposed by MRB. The Company understands that when applied in the 'Central Plains' (of Canterbury) the MRB methodology and approach has predicted discharge rates that have been found to be, approximately, 25% below the actual discharges. It also understands that MRB is now applying revised a methodology and approach that results in higher rates (than those it previously estimated) being produced.</p> <p>The RDRML considers that reference to the N losses not exceeding 27 kilograms per hectare per annum is, therefore, inappropriate on the basis that it was not derived using an appropriate methodology.</p>
Band	Limit	Status																		
A - Upper Hinds/Hekeko Plains Area	Up to 10kgN/ha/yr	Permitted activity																		
A - Lower Hinds/Hekeko Plains Area	Up to 15kgN/ha/yr	Permitted activity																		
B - Lower Hinds Hekeko Plains Area	>15kgN/ha/yr - 27 kgN/ha/yr And if land use established after 27 <sup>th</sup> Sept 2014 - maximum cap of 214 t/yr	Restricted activity discretionary																		
C - all areas	Over 27kgN/ha/yr	Discretionary If activity is established before 27 <sup>th</sup> Sept 2014 or if activity changes but no increase in nitrogen loss calculation. Prohibited if activity is established after 27 <sup>th</sup> Sept 2014.																		
Te Runanga o Arowhenua and Te Runanga o Ngai Tahu / 52233	V2 pL WRP-244	13.5.22	<p>Seeks to amend Rule 13.5.22 (2) to read:</p> <p><i>"2. The nitrogen loss calculation for the total area of land will not exceed the nitrogen load calculated in accordance with Rows A and/or B in Table 13(i); maximum N loss per hectare for land uses established after 27th September 2014 as set out in the B Band in Table XX nor the total allocation of 214 t N/yr either singularly or in combination with other resource consents granted for new land uses established after 27th September 2014."</i></p>	Oppose	<p>The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:</p> <p>The Submitter's approach relies on the arbitrary limits, including the 27kgN/ha/yr, which the RDRML has sought to advance an alternative methodology for (set out in Annexure C to the Company's Primary Submission).</p> <p>The RDRML notes that the rate of 27 kgN/ha/yr has been derived using a methodology and approach developed and proposed by Macfarlane Rural Business Limited (hereafter referred to as 'MRB'). The Company understands that when applied in the 'Central Plains' (of Canterbury) the MRB methodology and approach has predicted discharge rates that have been found to be, approximately, 25% below the actual discharges. It also understands that MRB is now applying revised a methodology and approach that results in higher rates (than those it previously estimated) being produced.</p> <p>The RDRML considers that reference to the N losses not exceeding 27 kilograms per hectare per annum is, therefore, inappropriate on the basis that it was not derived using an appropriate methodology.</p>															

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L&WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
Fish and Game Council – Central Island / South 53274	V2 pLWRP-392	New Objective	<p>Seeks the addition of a new objective as follows:</p> <p><i>“To sustainably manage the use and development of land, the discharge of contaminants including nutrients, and the taking, using, damming, or diverting of fresh water in the Hinds/Hekeao Plains Catchment so that:</i></p> <p><i>(a) Groundwater levels, river flows, lake and wetland levels and water quality maintain or enhance the habitat and health of aquatic ecosystems, macroinvertebrates, native fish and salmonids;</i></p> <p><i>(b) Water quality enables safe contact recreation and food gathering;</i></p> <p><i>(ba) Water quality and quantity enables safe and reliable human drinking water supplies;</i></p> <p><i>(c) The frequency and duration of excessive periphyton growths that adversely affect ecosystem health, recreational and cultural uses and amenity are reduced;</i></p> <p><i>(d) Wetlands are protected as significant habitats;</i></p> <p><i>(e) The mauri of surface water bodies and groundwater is recognised and adverse effects on aspects of water quality and quantity that contribute to healthy mauri are avoided.”</i></p>	Oppose	<p>The RDRML seek that the submission point be <b>disallowed</b> for the following reasons:</p> <p>The freshwater objectives in Section 3 of the Proposed Canterbury Land &amp; Water Regional Plan provide the narrative outcomes sought to be achieved for, or from, fresh water across the whole of the Canterbury region. As a consequence, RDRML do not consider it appropriate or necessary to introduce objectives into this sub-regional section, given that the relief sought is already embodied within Section 3, namely Objective 3.8, of the Proposed Canterbury Land &amp; Water Regional Plan.</p> <p>The relief sought by the Submitter would result in unnecessary duplication within the pL&amp;WRP.</p>
Fish and Game Council – Central Island / South 53274	V2 pLWRP-393	New Objective	<p>Seeks the addition of a new objective as follows:</p> <p><i>“Where the quality and quantity of fresh water has been degraded by human activities to such an extent that the freshwater Objectives set out above and in table 13(a) are not being achieved, water quality and quantity shall not be allowed to degrade further and it shall be improved progressively over time so that the objectives set out above and in table 13(a) is achieved by 2050.”</i></p>	Oppose	<p>The RDRML seek that the submission point be <b>disallowed</b> for the following reasons:</p> <p>The freshwater objectives in Section 3 of the Proposed Canterbury Land &amp; Water Regional Plan provide the narrative outcomes sought to be achieved for, or from, fresh water across the whole of the Canterbury region. As a consequence, RDRML do not consider it appropriate or necessary to introduce objectives into this sub-regional section, given that the relief sought is already embodied within Section 3, namely Objective 3.8, of the Proposed Canterbury Land &amp; Water Regional Plan.</p> <p>The relief sought by the Submitter would result in unnecessary duplication within the pL&amp;WRP.</p>
Fish and Game Council – Central Island / South 53274	V2 pLWRP-476	New Policy	<p>Seeks the addition of a new policy that reads as follows:</p> <p><i>“There are no direct or indirect discharges to surface water bodies or groundwater of:</i></p> <p><i>(a) untreated sewage, stock effluent, wastewater or bio-solids;</i></p> <p><i>(b) solid or hazardous waste or solid animal waste;</i></p> <p><i>(c) animal effluent from an effluent storage facility or a stock holding area;</i></p> <p><i>(d) organic waste or leachate from storage of organic material; and</i></p> <p><i>(e) untreated industrial or trade waste.</i></p> <p><i>For other discharges of contaminants to surface water bodies or groundwater or into or onto land where they may then enter surface water bodies or groundwater, the effects of any discharge are minimised by the use of measures that:</i></p> <p><i>(a) first, avoids the production of the contaminant;</i></p>	Oppose	<p>The RDRML seek that the submission point be <b>disallowed</b> for the following reasons:</p> <p>The additional Policy sought by the Submitter essentially duplicates policy direction on matters already embodied within Section 4 of the pL&amp;WRP. As such, the relief sought by the Submitter would create duplication within the sub-regional chapter for the Hinds/Hekeao Plains area that is considered to be both unnecessary and inappropriate.</p>

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L&WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
Fish and Game Council – Central Island / 53274	V2 pLWRP-482	New Policy	<p>(b) secondly, reuses, recovers or recycles the contaminant;</p> <p>(c) thirdly, reduce the volume or amount of the discharge; or</p> <p>(d) finally, wherever practical and relevant utilise land-based treatment, a wetland constructed to treat contaminants or a designed treatment system prior to discharge; and</p> <p>(e) meets the freshwater objectives/ limits/ targets set in tables 13(a) and (g). Any discharge of a contaminant into or onto land where it may enter groundwater shall:</p> <p>(a) not exceed the natural capacity of the soil to treat or remove the contaminant; and</p> <p>(b) not exceed available water storage capacity of the soil; and</p> <p>(c) where this is not practicable:</p> <p>(i). meet any nutrient limits/targets/loads or reductions set out in tables 13(a), (g), (h) and (i);</p> <p>(ii). utilise the best practicable option to ensure the size of any contaminant plume is as small as is reasonably practicable, and there is sufficient distance between the point of discharge, any other discharge and drinking water supplies to allow for the natural decay or attenuation of pathogenic micro-organisms in the contaminant plume;</p> <p>(iii). not result in the accumulation of pathogens, or a persistent or toxic contaminant that would render the land unsuitable for agriculture, commercial, domestic or recreational use or water unsuitable for its life supporting capacity, to meet community outcomes or as a source of potable water or for agriculture;</p> <p>(iv). not raise groundwater levels so that land drainage is impeded; and</p> <p>(v). not have any adverse effects on the drinking water quality of the groundwater, including any risk to public health</p> <p>(vi). not have any adverse effects on any surface water resources fed from that groundwater."</p>	Oppose	<p>The RDRML seek that the submission point be <b>disallowed</b> for the following reasons:</p> <p>The additional Policy sought by the Submitter essentially duplicates policy direction on matters already embodied within Section 4 of the pL&amp;WRP. As such, the relief sought by the Submitter would create duplication within the sub-regional chapter for the Hinds/Hekeao Plains area that is considered to be both unnecessary and inappropriate.</p> <p>Based on technical advice sought by the RDRML, the Company is opposed to the introduction of Land Use Classes ('LUC's') on the basis that they are (i) out of date, (ii) were based on an unscientific means of allocation and (iii) much of the classification concentrated on the deficiencies of the soil. With the advent of irrigation and 15+ years of Dairy farming, the Company understands that none of those characteristics are now displayed by the soil.</p>
			<p>Seeks the addition of a new policy that reads as follows:</p> <p>Land use activities affecting groundwater and surface water are managed as follows:</p> <p><b>Sediment</b></p> <p>a) Activities are managed to reduce the risk of accelerated erosion of the land and avoid discharges of sediment to surface water bodies</p> <p><b>Faecal contamination</b> Farming activities must be required to:</p> <p>a) Prevent cattle, deer, pigs, and horses access to surface water bodies and their beds</p> <p>b) Avoid direct discharges to surface water bodies including but not limited to from drains, tracks, culverts, bridges, raceways, runoff</p> <p>c) Establish programmes for implementing any required changes.</p> <p><b>Nutrients</b></p> <p>Land use activities must be managed including through regulation to:</p> <p>a) prevent direct discharges of nutrients to surface water bodies</p>		

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L&WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
Fish and Game Council – Central South Island / 53274	V2 pLWRP-489	New Policy	<p>b) meet leaching limits set at efficiency standards in catchments which are under allocated</p> <p>c) met LUC N leaching target in catchments which are approaching or exceeding limits</p> <p>d) prepare a nutrient management plan</p> <p>e) submit nutrient management plan and supporting input data to the regional council.</p> <p>Seeks the addition of a new policy that reads as follows:</p> <p>“Water quantity is managed to enable people, industry, and agriculture to take and use water to meet their reasonable needs while ensuring that:</p> <ol style="list-style-type: none"> <li>1. Minimum flows and allocation regimes are set for the purpose of maintaining or enhancing the existing life supporting capacity of water bodies and recognising and providing for values (listed)</li> <li>2. In times of water shortage, takes are restricted to those that are essential to the health or safety of people, and communities, or for drinking water for animals and all other takes are ceased.</li> </ol> <p>b) For groundwater</p> <ol style="list-style-type: none"> <li>1. Takes do not cause a significant adverse effect on the long term groundwater yield</li> <li>2. Groundwater takes that are hydraulically connected to surface water bodies are managed with minimum flow and allocation regimes established for those surface water bodies and to protect their natural character</li> <li>3. Groundwater takes that are hydraulically connected to lakes or wetlands are managed to protect the life supporting capacity and natural character of those wetlands and lakes</li> <li>4. The adverse effects of a groundwater take on other groundwater and surface takes are avoided</li> <li>5. Saltwater intrusion into coastal aquifers, induced by groundwater takes, is avoided.” </li></ol>	Oppose	<p>The RDRML seek that the submission point be <b>disallowed</b> for the following reasons:</p> <p>The additional Policy sought by the Submitter essentially duplicates policy direction on matters already embodied within Section 4 of the pL&amp;WRP. As such, the relief sought by the Submitter would create duplication within the sub-regional chapter for the Hinds/Hekeao Plains area that is considered to be both unnecessary and inappropriate.</p>
Fish and Game Council – Central South Island / 53274	V2 pLWRP-493	New Policy	<p>Seeks the addition of a new policy that reads as follows:</p> <p>“Water use must be necessary, reasonable, and justifiable for its intended use, and where it meets these criteria its use must be efficient. Water must be used efficiently, including by the following measures:</p> <ol style="list-style-type: none"> <li>1) Requiring water audits and water budgets to check for leakages and water use efficiency</li> <li>2) Requiring the use of, or progressive upgrade to infrastructure for water distribution that minimises the loss of water and restricts the use of water to the amounts determined by policy (reasonable, justifiable need for water)</li> <li>3) Enabling the transfer of water permits</li> <li>4) Raising awareness about water efficiency issues and techniques</li> <li>5) Requiring monitoring of water takes, including by installing water</li> </ol>	Oppose	<p>The RDRML seek that the submission point be <b>disallowed</b> for the following reasons:</p> <p>The additional Policy sought by the Submitter essentially duplicates policy direction on matters already embodied within Section 4 of the pL&amp;WRP. As such, the relief sought by the Submitter would create duplication within the sub-regional chapter for the Hinds/Hekeao Plains area that is considered to be both unnecessary and inappropriate.</p>

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Fish and Game Council – Central South Island / 53274	V2 pLWRP-506	Rule 13.5.8	<p><i>metering and telemetry."</i></p> <p>The Submitter seeks the deletion of Rule 13.5.8 and replacement with a rule that achieves the following outcomes and have the following types of controls:</p> <p><i>"Require farms to comply with a sustainable nitrogen leaching rate which is based on allocating the total allowable load of nitrogen as set out in amended table 13(j) on either a flat per hectare allocation of nitrogen leaching or a nitrogen leaching allowance per hectare based on an allocation on a land use capability class basis. Or some other methodology, which achieves efficient use of natural resources.</i></p> <p><i>Where current loads are far in excess of desired water quality and nutrient loads, the LUC leaching rates can be set to start high and then reduce overtime to achieve a trajectory of improvement towards the desired state. Where catchments are extremely over allocated in nutrients as the Lower Hinds and drains are, the timeline for setting the trajectory of improvement will be cross generational.</i></p> <p><i>Example of Land Use capability leaching rates. As discussed above step down rates may be required to achieve a trajectory of improvement over time.</i></p> <table border="1" data-bbox="810 1003 954 1518"> <thead> <tr> <th>LUC</th> <th>I</th> <th>II</th> <th>III</th> <th>IV</th> <th>V</th> <th>VI</th> <th>VII</th> <th>VIII</th> </tr> </thead> <tbody> <tr> <td>Leaching rate yr 1</td> <td>33</td> <td>32.3</td> <td>29.2</td> <td>21.8</td> <td>21.8</td> <td>12.5</td> <td>5</td> <td>2</td> </tr> <tr> <td>Leaching rate yr 5</td> <td>30</td> <td>29</td> <td>22</td> <td>20</td> <td>20</td> <td>11</td> <td>5</td> <td>2</td> </tr> </tbody> </table> <p><i>Require farms to comply with specified management practices which minimise or reduce the loss of nitrogen, phosphorus, sediment, and microbial contaminants, including but not limited to the requirement to seal effluent ponds and to practice deferred irrigation, good management practices for the application of fertiliser and other nutrient sources including setback distances from water bodies, permanent fencing and planting of riparian margins, good management practices for earthworks and cultivation including setback distances from water bodies of at least 6m to avoid or minimise sediment run off to water."</i></p>	LUC	I	II	III	IV	V	VI	VII	VIII	Leaching rate yr 1	33	32.3	29.2	21.8	21.8	12.5	5	2	Leaching rate yr 5	30	29	22	20	20	11	5	2	Oppose	<p>The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:</p> <p>Based on technical advice sought by the RDRML, the Company is opposed to the introduction of LUC's on the basis that they are (i) out of date, (ii) were based on an unscientific means of allocation and (iii) much of the classification concentrated on the deficiencies of the soil. With the advent of irrigation and 15+ years of Dairy farming, the Company understands that none of those characteristics are now displayed by the soil.</p> <p>Additionally, RDRML consider that the approach sought by the Submitter is inconsistent with the nutrient management approach advanced under the L&amp;WRP and Variation 1 and should not be advanced on an independent and stand alone basis for this sub-regional section of the L&amp;WRP.</p>
LUC	I	II	III	IV	V	VI	VII	VIII																								
Leaching rate yr 1	33	32.3	29.2	21.8	21.8	12.5	5	2																								
Leaching rate yr 5	30	29	22	20	20	11	5	2																								
Fish and Game Council – Central South Island / 53274	V2 pLWRP-397	Table 13(j)	<p>Amend Table 13 (j) and require that it be applied to all Rivers of section 13, not just the Hinds/Hekeao Plains.</p>	Oppose	<p>The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:</p> <p>The implications of applying Table 13(j) to all waterbodies subject to Section 13 is unknown and has not been analysed through the Section 32 Analysis supporting Variation. As such, the RDRML consider it inappropriate to apply Table 13(j) in the manner advanced by the Submitter.</p>																											

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L&WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
Fish and Game Council – Central Island / 53274	V2 pLWRP-527	Schedule 7 – Farm Environment Plan and Schedule 24a – Farm Practices	The Submitter seeks amendments to Schedules 7 and 24a to ensure OVERSEER assumptions are mandatory requirements and that the process meets certainty and objectivity requirements.	Oppose	<p>The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:</p> <p>The RDRML notes that Schedule 24a seeks to ensure that, when using OVERSEER to address nutrient management issues, this is undertaken in accordance with the OVERSEER Best Practice Data Input Standards [2013]. Similarly, Schedule 7 of the L&amp;WRP already refers to OVERSEER for the purposes nutrient budgeting in the preparation of a Farm Environment Plan.</p> <p>As such, the RDRML consider that the existing plan provisions within Schedule 7 and those proposed within Schedule 24a address the resource management issues raised by the submitter.</p>
Fish and Game Council – Central Island / 53274	V2 pLWRP-568	Schedule 24a – Farm Practices	The Submitter seeks that the Schedule 24a be amended to include a 50 metre setback (at minimum) to important water bodies; and to limit nitrogen-loading and application depth and rate dependent on soil type and the quality of the receiving environment.	Oppose	<p>The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:</p> <p>The RDRML considers that the relief sought by the Submitter is not warranted in terms of both the resource management issues raised by the Submitter and also the potential implications of the loss of productive farmland that would occur.</p>
Community and Public Health, Canterbury DHB / 53682	V2 pLWRP- 1051	Policy 13.4.9	The Submitter opposes the use of the word 'restrict' and recommends a quantifiable reference should be put into Policy 13.4.9(c) to give guidance as to what 'restrict' means in this case.	Support	<p>The RDRML seeks that the submission point be <b>allowed</b> for the following reasons:</p> <p>The RDRML considers that the use of the term 'restrict' within point 'c' is somewhat ambiguous and may result in interpretation issues. As such, the RDRML support, in principle, that additional guidance should be included within the Policy to assist in interpretation.</p>
Community and Public Health, Canterbury DHB / 53682	V2 pLWRP- 1060	Table 13(a)	The Submitter considers that the limits of 50% cyanobacteria cover for Hill-fed Lower and Spring-fed plain is high. Noting that, at this level there is a potential that cyanotoxins may effect drinking water supplies and carry a health risk for contact water users gathering mahinga kai. As such, the submitter recommends that all % limits should be at 20% as any level above 20% creates a public health warning situation.	Oppose	<p>The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:</p> <p>As per the RDRML's primary submission to Table 13(a) (Submission Point V2 pLWRP-708), the Company is concerned that the cyanobacteria limits advanced within Variation 2 are more conservative than those generally advanced under Table 1(a) of the pL&amp;WRP. Specialist advice provided to the Company is that these lower limits are not justified.</p> <p>Specialist advice provided to RDRML in relation to this submission point is that the relief sought by the Submitter is not justified for the following reasons:</p> <ul style="list-style-type: none"> <li>A maximum of 50% cyanobacteria cover is the desired outcome for Hill-fed Lower and Spring-fed plain management units within Table 1a of the pL&amp;WRP. It is appropriate that the Hill-fed lower and Spring-fed plain management units have a higher percentage cover limit than that of Hill-fed upland (20%) due to differences in physical/habitat characteristics of these</li> </ul>

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L&WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
					<p>management units.</p> <ul style="list-style-type: none"> <li>The document cited in the submission "New Zealand Guidelines for Cyanobacteria in Recreational Fresh Water, Interim Guidelines, MFE &amp; MOH 2009" relates to the recreational values of freshwaters and not all waterways within the Hinds area will be used for recreation. A maximum 20% cover level of cyanobacteria is not justified for the protection of other environmental values such as ecosystem health and amenity. Therefore it is not appropriate to apply a 20% limit to all waterways within the Hinds area, regardless of their recreational value.</li> <li>The recreational guideline document is not relevant to setting levels for drinking water supplies. However, in the submission it appears to be used in reference to protecting drinking-water supplies.</li> <li>The recreational guidelines were intended to be interim guidelines only, released for trial use by monitoring and health agencies until the end of the 2011/12 summer. Additionally pg. 3. of the guidelines states:</li> </ul> <p>Given that the Submitter seeks an even more conservative approach than that advanced by Variation 2 (and opposed by the RDRML), the RDRML opposes the relief sought.</p>
Community and Public Health, Canterbury DHB / 53682	V2 pLWRP- 1061	Table 13(k)	The submitter requests that Table 13(k) is amended to provide a long-term target of 5.6mg/L nitrate-nitrogen instead of 6.9mg/L. The submitter notes that the Canterbury Water Management Strategy Targets by 2040 states "Average annual nitrate levels in all groundwater wells in Canterbury are below 50% of the maximum allowable value for drinking water". The submitter goes on to note that the Drinking Water Standards of NZ have the MAV set at 50mg/L, which is equal to 11.3 mg/L for nitrate-nitrogen.	Oppose	<p>The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:</p> <p>As per the RDRML's primary submission to Table 13(k) (Submission Point V2 pLWRP-712), the Company is concerned by the methodology employed in the setting of targets and proposes an alternate methodology for setting the same.</p>
Terralea Partnership / 56652	V2 pLWRP- 1196	Table 13(e)	The submitter considers the timeframes for surface water takes to be too short and requests they are extended until at least 2035.	Support	<p>The RDRML seeks that the submission point be <b>allowed</b> for the following reasons:</p> <p>RDRML is concerned to ensure that the timeframe needed for existing water users to understand the flow regimes that apply, to determine how they (and their operations) could be adversely affected, and then to find a solution (which could be the development of on farm storage and/or the conversation to a different type of irrigation application), fund that solution and then implement the same could take more than five years.</p> <p>Advice to the Company is that it would be better to extend this date to 2035, as that will achieve the ecological and broader environmental improvements that are sought, while not causing unacceptable social and economic consequences.</p>

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L&WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
P Everest and Others / 56669	V2 pLWRP- 1125	Policies 13.4.8 and 13.4.9	<p>The submitter opposes Policies 13.4.18 and 13.4.19 proposing that 13.4.18 delete the reference to the date of the '30 June 2020' and read from "...table 13(e) until there is a collaboratively developed flow and allocation regime that has been included in the plan through a Schedule 1 RMA process".</p> <p>The Submitter notes that the new flow and allocation regime will seek to accommodate those that still use water from the drains, will reflect those who wish to resign their surface consents, those who can successfully transfer to groundwater and will reflect an intention to share additional flows (as a result of TSA and/or MAR) in the surface water bodies so that in-stream values can be enhanced and existing water uses, maintained.</p>	Support in Part	<p>The RDRML seeks that the submission point be <b>allowed</b> as it relates to the deletion of the date '30 June 2020' in Policy 13.4.18 for the following reasons:</p> <p>The RDRML is concerned that the application of the default minimum flows and allocation blocks (50% of 7DMALF and an allocation of 20% 7DMALF) to the waterbodies listed in Table 13(e) by 2020 has far reaching implications, and could cause unacceptable adverse social and economic effects to be generated.</p> <p>In this regard, the Company understands that the waterbodies listed presently support a number of abstractions, which, in turn, assist in providing for the social and economic wellbeing on the community. While not opposing the imposition of minimum flows and allocations, per se, and supporting the principle of a collaboratively developed allocation and flow regime being inserted into the pLWRP via a Schedule 1 (to the Act) process, the RDRML is concerned to ensure that the timeframe needed for existing water users to understand the flow regimes that apply, to determine how they (and their operations) could be adversely effected, and then to find a solution (which could be the development of on farm storage and/or the conversation to a different type of irrigation application), fund that solution and then implement the same could take more than five years.</p> <p>Advice to the Company is that it would be better to extend this date to 2035, as that will achieve the ecological and broader environmental improvements that are sought, while not causing unacceptable social and economic consequences.</p>
Mr Lyndsay Read / 56721	V2 pLWRP-936	Rule 13.5.16	<p>The Submitter seeks the removal of the 'and' at the end of 13.5.16(1) and replacing it with 'or', so that either condition 1 or 2 must be met and not both, thus the provision is made less restrictive.</p> <p>The Submitter states that all farms should be allowed to operate up to 20kg N loss as a permitted activity, even if they have a very low baseline and are not part of a scheme they should not have to apply for consent to operate at this level.</p>	Oppose (in part)	<p>The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:</p> <p>While the Company supports the intent of this relief, the Company is concerned about the implications that this approach may have for irrigation and principal water suppliers in the catchment. Given the uncertainty relating to this approach, RDRML opposes the relief sought.</p>
Beef and Lamb New Zealand / 56727	V2 pLWRP-228	13.1A – Definitions – 'baseline land use'	<p>The Submitter seeks that the definition of 'baseline land use' be deleted following the adoption of the natural capital (LUC) based N loss allocation model. The Submitter notes that Section 13.1A provides for Sub-regional section definitions, including one for Baseline Land Use.</p>	Oppose	<p>The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:</p> <p>on the basis that they are (i) out of date, (ii) were based on an unscientific means of allocation and (iii) much of the classification concentrated on the deficiencies of the soil. With the advent of Irrigation and 15+ years of Dairy farming, the Company understands that none of those characteristics are now displayed by the soil.</p> <p>Additionally, RDRML consider that the approach sought by the Submitter is inconsistent with the nutrient management approach advanced under the L&amp;WRP and Variation 1 and should not be</p>

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L&WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
Beef and Lamb New Zealand / 56727	V2 pLWRP-230	Policy 13.4.11	<p>The Submitter seeks that Policy 13.4.11 is amended so that:</p> <p>Maintain water quality i (a) In the Upper Hinds/Hekeao Plains Area, by capping discharges of nitrogen at 114 tonnes of nitrogen per year and requiring all farming activities to operate at good management practice to maintain current phosphorus losses:</p> <ul style="list-style-type: none"> <li>i. Requiring all farming activities operate at good management practice; and</li> <li>ii. Requiring the adoption of nitrogen loss rates to meet catchment load, based on Land Use Capability, from 2025.</li> </ul> <p>(b) In the Lower Hinds Plains Area</p> <ul style="list-style-type: none"> <li>i. Requiring all farming activities to operate at good management practice; and</li> <li>ii. the adoption of nitrogen loss rates to meet the catchment load based on Land Use Capability, from 2025. Amend rules to reflect this revised approach to N loss allocation.</li> </ul> <p>The submitter notes that, given that the issue of allocation is complex, it is reasonable to expect the solution to also be somewhat complex. There is a solution that has the advantage that both the High Court and Board of Inquiry have considered and decided in its favour. That approach is Natural Capital, using Land Use Capability as its proxy. The Submitter notes that this approach is now in place in Horizons, and is to be introduced in Hawkes Bay.</p>	Oppose	<p>advanced on an independent and stand alone basis for this sub-regional section of the L&amp;WRP.</p> <p>The RDRML seeks that the submission point be <b>disallowed</b> for the following reasons:</p> <p>Based on technical advice sought by the RDRML, the Company is opposed to the introduction of LUC's on the basis that they are (i) out of date, (ii) were based on an unscientific means of allocation and (iii) much of the classification concentrated on the deficiencies of the soil. With the advent of irrigation and 15+ years of Dairy farming, the Company understands that none of those characteristics are now displayed by the soil.</p> <p>Additionally, RDRML consider that the approach sought by the Submitter is inconsistent with the nutrient management approach advanced under the L&amp;WRP and Variation 1 and should not be advanced on an independent and stand alone basis for this sub-regional section of the L&amp;WRP.</p>
Irrigation Zealand 52278	V2 pLWRP-191	Rule 13.5.15	<p>Seeks amendments to the policy that reads as follows:</p> <p><i>'...provided the following conditions are met:</i></p> <p><i>1. The nitrogen loss calculation for the property does not exceed the maximum annual (30 June to 1 July) nitrogen loss for that property over the period 1 July 2009 to 30 June 2013; and either'</i></p>	Support	<p>The RDRML seek that the submission point be <b>allowed</b> for the following reasons:</p> <p>The RDRML understands that the Council has recently recognised an issue with the nitrogen baseline, affecting the nitrogen loss calculation, publishing implementation guidance on the same, as such, the Company support the submitter's submission in principal, ensuring that the nitrogen baseline concept and associated calculations are appropriately recorded in the final version of the variation.</p>
Mr Edward Winchester 56728	V2 pLWRP-949	Policy 13.4.18	<p>Seeks amendments to Policy 13.4.18 so that existing minimum flows are not replaced by the proposed default minimum flow unless it can be conclusively shown through site specific field investigations that this will benefit in stream values, while not reducing the current reliability of supply for existing consent holders.</p>	Support	<p>The RDRML seeks that the submission point be <b>allowed</b> as it relates to the deletion of the date '2020' in Policy 13.4.18 for the following reasons:</p> <p>Advice to the Company is that it would be better to extend this date to 2035, as that will achieve the ecological and broader environmental improvements that are sought, while not causing unacceptable social and economic consequences.</p>
Eiffelton Community Group Irrigation Scheme	V2 pLWRP-1045	13.5.21 to 13.5.23	<p>Amend the note under Irrigation Schemes:</p> <p>"Rule 13.5.21 and 13.5.23 prevail over Region-wide Rules 5.60, 5.61 and 5.62 in the Hinds/Hekeao Plains Area."</p>	Support	<p>The RDRML seek that the submission point be <b>allowed</b> to correct this minor error in the text.</p>

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L&WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
Inc 56799 Eiffelton Community Group Irrigation Scheme Inc 56799	V2 pLWRP-1062	13.5.31	Amend Rule 13.5.31 as follows: <del>The groundwater take will be abstracted on the same property as the existing resource consent and there is no increase in the proposed annual volume;</del> and OR Re-write condition to refer to water use rather than 'take' and 'abstracted'	Support	The RDRML seek that the submission point be <b>allowed</b> for the following reasons: RDRML agrees with the submitter that greater flexibility should be provided within this rule, for example, using drains as a conduit for delivering that water may be a more pragmatic solution in some cases.
Eiffelton Community Group Irrigation Scheme Inc 56799	V2 pLWRP-1063	13.5.32	Amend activity status of Rule 13.5.32 from "prohibited" to "non-complying"	Support	The RDRML seek that the submission point be <b>allowed</b> for the following reasons: RDRML agrees with the submitter that there may be circumstances where any of conditions 1 to 3 will not be strictly met but the overall environment and the wider aims of Variation 2 are better met by allowing a proposal to proceed.
Eiffelton Community Group Irrigation Scheme Inc 56799	V2 pLWRP-1064 and V2 pLWRP-1065	Rule 13.5.34 and Rule 13.5.35	Amend Rule 13.5.34 to provide an exception to effect that the take and use of groundwater or surface water for the purposes of increasing reliability of supply from an irrigation scheme or for ancillary irrigation scheme purposes is a discretionary activity. OR Provide for a new rule (in which case Rules 13.5.34 and 13.5.35 would cover all circumstances not covered by the new rule).	Support	The RDRML seek that the submission point be <b>allowed</b> for the following reasons: RDRML agrees a transfer in circumstances where it is being used to booster irrigation scheme supply reliability or for ancillary irrigation scheme purposes may be appropriate and should be provided for in accordance with the relief sought by the submitter.
Eiffelton Community Group Irrigation Scheme Inc 56799	V2 pLWRP-1066	Rule 13.5.35	Amend Rule 13.5.36 by: a) deleting condition 4; b) amending condition 5 by including the word "...for irrigation, ecological..."	Support	The RDRML seek that the submission point be <b>allowed</b> on the basis that the Rule is unnecessarily restrictive and should also be amended to provide for irrigation and ecological outcomes in condition 5.
Horticulture New Zealand 52267	V2 pLWRP-615	13.4.11	Amend the 114 tonne limit to be an interim target.	Support	The RDRML seek that the submission point be <b>allowed</b> for the following reasons: RDRML agrees with the submitter that very little emphasis should be placed on numeric modelling of loads due to the uncertainty that the numeric figure can be achieved or is even accurate. As a consequence, it is more appropriate that 114 tonne limit be an interim target that the Council, working with the community of the Hinds/Hekeao Plains, work to achieve.
Horticulture New Zealand 52267	V2 pLWRP-622 and V2 pLWRP-640	New Policy and rule framework	Add a new policy and commensurate permitted activity rules and methods to enable transfer of nitrogen within and between enterprises and farms within the same water management unit (or similar rules and methods) to give effect to development of a transfer system.  Add a new rule and method framework to support policy requested on transfer of nutrients	Support	The RDRML seek that the submission point be <b>allowed</b> for the following reasons: RDRML agrees that Variation 2 should be supported with a provision for a transfer regime for nitrogen to ensure that there is the ability to change land use, while still being limited by the catchment load limit.
Dairy Holdings Ltd 53683	V2 pLWRP-982	13.1A: Definitions -	Amend the definition of Baseline Land Use: "a) expressly contemplate farming enterprises and irrigation schemes - and provide a clear method of determining the nitrogen baseline for	Support (in part)	The RDRML seek that the submission point be <b>allowed</b> for the following reasons:

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L& WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
Dairy Holdings Ltd 53683	V2 pLWRP-998	13.5.23	<p>each being:</p> <p>i) the total combined nitrogen baseline in the case of farming enterprises; and</p> <p>ii) the total combined nitrogen baseline in the case of existing irrigation plus any consented but not yet implemented irrigation in the case of an irrigation scheme (noting that the latter might be achieved through appropriate separate recognition elsewhere in the plan).</p> <p>b) remedy the current issue around reference to Rules 5.46 and 5.62; and</p> <p>c) ensure that the nitrogen baseline still enables compliance to be measured against both the average and the highest annual N-loss in the period in 2009-2013 (consistent with the use of OVERSEER as a long term model)."</p> <p>Amend Rule 13.5.23 to be non-complying</p>	Support	<p>RDRML supports (in principle) the submitter's intention that the definition is made clearer and easier to understand, which better accords with good planning and resource management practice. The Company, notes that this definition should also provide reference to principal water supplier, such as the RDR.</p> <p>The RDRML seek that the submission point be <b>allowed</b> for the following reasons: RDRML does not consider non-compliance with this rule to be sufficiently inappropriate or 'repugnant' to attract a prohibited activity classification.</p> <p>The RDRML seek that the submission point be <b>allowed</b> for the following reasons:</p>
Dairy Holdings Ltd 53683	V2 pLWRP-1005 and V2 pLWRP-1006	Rules 13.5.34 and 13.5.35	<p>Amend Rules 13.5.34 and 13.5.35 by way of providing an exception (or provide for a new rule, in which case Rules 13.5.34 and 13.5.35 would cover all circumstances not covered by the new rule) to the effect that the take and use of groundwater or surface water for environmental enhancement, for the purposes of increasing the reliability of supply from an irrigation scheme or for ancillary irrigation scheme purposes is a discretionary activity.</p>	Support	<p>RDRML agrees a transfer in circumstances where it is being used to booster irrigation scheme supply reliability or for ancillary irrigation scheme purposes may be appropriate and should be provided for in accordance with the relief sought by the submitter.</p>
Dairy Holdings Ltd 53683	V2 pLWRP-1014	New Rule	<p>Add a new rule to the effect that if OVERSEER is updated, the most recent version can be used to both:</p> <p>a) re-calculate any N-loss limit/load (including the nitrogen baseline)</p> <p>b) assess compliance against the re-calculated N-loss limit/load (including the nitrogen baseline);</p>	Support (in part)	<p>The RDRML seek that the submission point be <b>allowed</b> for the following reasons:</p> <p>RDRML supports (in principle) the submitter intention to provide for a method where OVERSEER is updated, however, the Company reserves its position on this relief until such time as a more comprehensive rule framework is provided for.</p>
Dairy New Zealand 52271	V2 pLWRP-564	13.4.14	<p>Add a new Policy 13.4.14A: "Enable catchment scale mitigations that improve overall water quality in the Hinds/Hekeao Plains Area and improve reliability of supply for surface water takes, including: (a) improving flows in the spring fed water bodies (b) decreasing nitrate nitrogen concentrations in the Hinds River/Hekeao and spring fed waterbodies; or (c) enhancing in-stream habitat."</p>	Support (in part)	<p>Subject to the acceptance of RDRML's own submission to Policy 13.4.14, the Company supports this additional policy, given that it seeks to provide greater guidance on the catchment scale mitigation options to support Variation 2.</p>
Dairy New Zealand 52271	V2 pLWRP-577	13.5.15	<p>Seeks amendments to Rule 13.5.15(1) as follows: "1. The nitrogen loss calculation for the property, excluding any area of land subject to a resource consent granted under Rule 13.5.14, does not increase above the nitrogen baseline; exceed the highest annual (30 June to 1 July) nitrogen loss modelled for that property over the period 1 July 2009 to 30 June 2013; and either"</p>	Support	<p>The RDRML seek that the submission point be <b>allowed</b> for the following reasons: The RDRML understands that the Council has recently recognised an issue with the nitrogen baseline, affecting the nitrogen loss calculation, publishing implementation guidance on the same, as such, the Company support the submitter's submission in principal, ensuring that the nitrogen baseline concept and associated calculations are appropriately recorded in the final version of the</p>

Submitter Name / ID	Submission Point ID	Relevant Variation 2- Relevant L& WRP Section	Submission Point	Support/oppose	Relief Sought / Reasons
Fertiliser Association of New Zealand 56725	V2 pl.WRP-814	Rules	Delete prohibited activity status under Rules 13.5.12 and 13.5.20.	Support	variation. The RDRML seek that the submission point be <b>allowed</b> for the following reasons: RDRML does not consider non-compliance with Rules 13.5.12, and 13.5.20 to be sufficiently inappropriate or 'repugnant' to attract a prohibited activity classification.
Fertiliser Association of New Zealand 56725	V2 pl.WRP-911	Schedule 24(a) Nutrient Management:	Amend Schedule 24a (a) Nutrient Management condition (i) as follows: <i>"A nutrient budget based on soil nutrient tests has been prepared, using OVERSEER in accordance with the OVERSEER Best Practice Data Input Standards [2013], or an equivalent model approved by the Chief Executive of Canterbury Regional Council Environment Canterbury and is reviewed annually. A nutrient budget will remain valid for 3 years unless there is a significant farm system change. Records kept to support the nutrient budget shall be reviewed annually in accordance with an industry programme approved by Environment Canterbury (or in the absence of an industry programme, as directed by Environment Canterbury) to assess whether any significant farm system changes are evident. A significant farm system change is a change in farming practices beyond routine fluctuations that arise as a result of rotation, or annual/seasonal variation in climatic and/or market conditions."</i>	Support (in part)	Subject to the acceptance of RDRML's own submission to Schedule 24(a), the Company supports the proposed relief sought by the submitter, given the practical implications for RDRML associated with the annual review of all Nutrient Budgets. An annual review of Nutrient Budgets is neither efficient nor required for resource management reasons, where there has been no change associated with farming systems.
Fertiliser Association of New Zealand 56725	V2 pl.WRP-819	13.4.11	Retain the Good Management Practice approach to controlling phosphorus loss, but amend text in Policy 13.4.11 to say: <i>"Maintain water quality in the Upper Hinds/Hekeao Plains Area by capping discharges of nitrogen at 114 tonnes of nitrogen per year and requiring all farming activities to operate at good management practices to maintain current control phosphorus losses."</i>	Support (in part)	The RDRML seek that the submission point be <b>allowed</b> for the following reasons: RDRML agrees that maintaining phosphorus loss at current levels for the Upper Hinds/Hekeao area may or may not be appropriate and therefore the alternative wording is a more appropriate response to this matter.
Fertiliser Association of New Zealand 56725	V2 pl.WRP-820	13.4.12	Amend Policy 13.4.12 as follows: <i>"Improve water quality in the Lower Hinds/Hekeao Plains Area by reducing the discharge of nitrogen losses from farming activities to achieve a target load of 3,400 tonnes of nitrogen per year by 2035."</i>	Support	The RDRML seek that the submission point be <b>allowed</b> for the following reasons: RDRML agrees with the amendment as this is make it clear that it applies to "losses from the farm", defined as 'nutrient discharge' in the CLWRP.
Ravensdown Fertiliser Co-Operative Limit 56708	V2 pl.WRP-730	Definition	Add definition of farming activity: <i>"means the use of land for the production of primary products including agricultural, pastoral, horticultural and forestry products."</i>	Support	The RDRML seek that the submission point be <b>allowed</b> for the following reasons: RDRML considers that adding this definition provides for greater clarity when reading the policy and rule framework of Variation 2.
Ravensdown Fertiliser Co-Operative Limit 56708	V2 pl.WRP-753	Rules	Delete prohibited activity status under Rules 13.5.12 and 13.5.20.	Support	The RDRML seek that the submission point be <b>allowed</b> for the following reasons: RDRML does not consider non-compliance with Rules 13.5.12, and 13.5.20 to be sufficiently inappropriate or 'repugnant' to attract a prohibited activity classification.
Ravensdown Fertiliser Co-Operative Limit	V2 pl.WRP-763	13.5.23	Amend Rule 13.5.23 to be non-complying	Support	The RDRML seek that the submission point be <b>allowed</b> for the following reasons: RDRML does not consider non-compliance with this rule to be

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56708 Ravensdown Fertiliser Co-Operative Limited 56708	V2 pLWRP-770	Schedule 24(a) Nutrient Management:	Amend Schedule 24a (a) Nutrient Management condition (i) as follows: "A nutrient budget based on soil nutrient-tests has been prepared, using OVERSEER in accordance with the OVERSEER Best Practice Data Input Standards (2013-4), or an equivalent model approved by the Chief Executive of Canterbury Regional Environment Canterbury and is reviewed annually. A nutrient budget will remain valid for 3 years unless there is a significant farm system change. Records kept to support the nutrient budget shall be reviewed annually in accordance with an industry programme approved by Environment Canterbury (or in the absence of an industry programme, as directed by Environment Canterbury) to assess whether any significant farm system changes are evident.  A significant farm system change is a change in farming practices beyond routine fluctuations that arise as a result of rotation, or annual/seasonal variation in climatic and/or market conditions."	Support (in part)	sufficiently inappropriate or 'repugnant' to attract a prohibited activity classification.  Subject to the acceptance of RDRML's own submission to Schedule 24(a), the Company supports the proposed relief sought by the submitter, given the practical implications for RDRML associated with the annual review of all Nutrient Budgets. An annual review of Nutrient Budgets is neither efficient nor required for resource management reasons, where there has been no change associated with farming systems.
Hinds Plains Land and Water Partnership 56730	V2 pLWRP-321	13.5.14	Amend Variation so it specifies the area allocated to consent holders and how remaining area is to be allocated to future consent holders	Oppose	The RDRML seek that the submission point be <b>disallowed</b> for the following reasons:  The RDRML understands the the submitter relief to be that it considers that it would be better if consent holders, such as BCI and RDRML (and any others) had specific loads assigned to them in relation to the 30,000 hectares area to be intensified. RDRML opposes this on the basis that it is more appropriate for these to be set under resource consent that apply to respective scheme command areas.
Director General of Conservation 53688	V2 pLWRP-460	Table 13(g):	Retain Table 13(g)  Consider adding intermediate 2020, 2025, 2030 nitrogen load reduction targets in Table 13(g) calculated from Table 13(h).	Oppose	The RDRML seek that the submission point be disallowed for the following reasons:  The RDRML highlighted in its primary submission to Table 13(g) that there are a number of issues associated with achieving the reductions that would be needed to reach the 3,400 tN/yr target by 2035. Given the issues that exist, the Company is particularly concerned that achieving the 3,400 tN/yr target by 2035 is neither realistic nor practicable, and that attempting to do so would likely generate adverse social and economic effects that do not accord with the Act's purpose. While the Company understands the reasoning behind the relief sought by the submitter, it is considered more appropriate that any target date is derived from a comprehensive and detailed investigation that employs the methodology set out in Annexure A to RDRML's submission.
Director General of Conservation 53688	V2 pLWRP-1250	New Policy	Add new Policy 13.4.21 (or similar):  "Enable targeted stream augmentation east of SH1 in the Lower Hinds/Hekeao areas to sustain freshwater ecosystems while providing	Support (in part)	Subject to the acceptance of RDRML's own submission to Policy 13.4.14, the Company supports this additional policy, given that it seeks to provide greater guidance on the lower catchment mitigation options to support Variation 2.

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Fonterra Co-operative Group Limited 52333	V2 pLWRP-780	Insert Policies 13.4.9 to 13.4.19 -	<p><i>water reticulation services to supply existing irrigation schemes."</i></p> <p>Add a new Policy 13.4.14A:</p> <p>"Enable catchment scale mitigations that improve overall water quality in the Hinds/Hekeao Plains Area and improve reliability of supply for surface water takes, including:</p> <p>(a) improving flows in the spring fed water bodies</p> <p>(b) decreasing nitrate nitrogen concentrations in the Hinds River/Hekeao and spring fed waterbodies; or</p> <p>(c) enhancing in-stream habitat."</p> <p>Seeks amendments to Rule 13.5.15(1) as follows:</p> <p><i>"1. The nitrogen loss calculation for the property, excluding any area of land subject to a resource consent granted under Rule 13.5.14, does not increase above the nitrogen baseline; exceed the highest annual (30 June to 1 July) nitrogen loss modelled for that property over the period 1 July 2009 to 30 June 2013; and either"</i></p>	Support (in part)	<p>Subject to the acceptance of RDRML's own submission to Policy 13.4.14, the Company supports this additional policy, given that it seeks to provide greater guidance on the catchment scale mitigation options to support Variation 2.</p> <p>For completeness, RDRML, does not support, the submitters amendments to Policy 13.4.14.</p> <p>The RDRML seek that the submission point be <b>allowed</b> for the following reasons:</p> <p>The RDRML understands that the Council has recently recognised an issue with the nitrogen baseline, affecting the nitrogen loss calculation, publishing implementation guidance on the same, as such, the Company support the submitter's submission in principal, ensuring that the nitrogen baseline concept and associated calculations are appropriately recorded in the final version of the variation.</p> <p>Subject to the acceptance of RDRML's own submission to Policy 13.4.14, the Company supports (in principle) the amendments sought to this policy, given that it reflects the importance of irrigation schemes being able to be utilised as a conduit to manage flows within the Hinds Drains district.</p>
Fonterra Co-operative Group Limited 52333	V2 pLWRP-791	13.5.15	<p>Seeks amendments to Policy as follows:</p> <p>(1) retain the use of existing infrastructure and methods used by ECGIS to run their irrigation scheme and others who have invested in infrastructure (ponds) and</p> <p>(2) Allow similar schemes to be established within the Hinds Drains district if this is feasible and necessary as a way of improving the flow and decreasing nitrates.</p> <p>Add new condition as follows:</p> <p>Where existing infrastructure such as used by the ECGIS and others to supplement flows or harvest water for irrigation are encouraged.</p> <p>Amend Rules to enable other options (other than MAR) to improve flows in the drainage network.</p>	Support	<p>The RDRML seek that the submission point be <b>allowed</b> for the following reasons:</p> <p>RDRML supports (in principle) the need to provide for a broad range of options to manage and improve flows within the Hinds Drains district.</p> <p>Subject to the acceptance of RDRML's own submission to Schedule 24(a), the Company supports the proposed relief sought by the submitter, given the practical implications for RDRML associated with the annual review of all Nutrient Budgets. An annual review of Nutrient Budgets is neither efficient nor required for resource management systems, where there has been no change associated with farming systems. The Company supports the definition of 'material change' reflected within this relief as it provides clear guidance as to when a review may be required.</p>
Eiffelton Community Group Irrigation 56798	V2 pLWRP-1092	13.4.14	<p>Seeks amendments to Policy as follows:</p> <p>(1) retain the use of existing infrastructure and methods used by ECGIS to run their irrigation scheme and others who have invested in infrastructure (ponds) and</p> <p>(2) Allow similar schemes to be established within the Hinds Drains district if this is feasible and necessary as a way of improving the flow and decreasing nitrates.</p> <p>Add new condition as follows:</p> <p>Where existing infrastructure such as used by the ECGIS and others to supplement flows or harvest water for irrigation are encouraged.</p> <p>Amend Rules to enable other options (other than MAR) to improve flows in the drainage network.</p>	Support (in part)	<p>The RDRML seek that the submission point be <b>allowed</b> for the following reasons:</p> <p>RDRML supports (in principle) the need to provide for a broad range of options to manage and improve flows within the Hinds Drains district.</p> <p>Subject to the acceptance of RDRML's own submission to Schedule 24(a), the Company supports the proposed relief sought by the submitter, given the practical implications for RDRML associated with the annual review of all Nutrient Budgets. An annual review of Nutrient Budgets is neither efficient nor required for resource management systems, where there has been no change associated with farming systems. The Company supports the definition of 'material change' reflected within this relief as it provides clear guidance as to when a review may be required.</p>
Eiffelton Community Group Irrigation 56798	V2 pLWRP-1113	13.5 Rules	<p>Seeks amendments to Schedule 24(a)(i) as follows:</p> <p><i>"(i) A nutrient budget based on soil nutrient tests has been prepared, using OVERSEER in accordance with the OVERSEER Best Practice Data Input Standards [2013], or an equivalent model approved by the Chief Executive of Canterbury Regional Council and shall only need to be reviewed annually where;</i></p> <p><i>(a) The use of land for a farming activity results in a material change defined as an increase in modelled nitrogen or phosphorus losses over a property which exceed 10% over the previous years nutrient budget;</i></p> <p><i>(b) Where the use of land for a farming activity results in a material change as set out in clause (a)(i)(a) above, the nutrient budget shall be updated using OVERSEER or an approved equivalent model in accordance with clause (a)(i);</i></p> <p><i>(c) In the event that the use of land for a farming activity does not result</i></p>	Support (in part)	<p>The RDRML seek that the submission point be <b>allowed</b> for the following reasons:</p> <p>RDRML supports (in principle) the need to provide for a broad range of options to manage and improve flows within the Hinds Drains district.</p> <p>Subject to the acceptance of RDRML's own submission to Schedule 24(a), the Company supports the proposed relief sought by the submitter, given the practical implications for RDRML associated with the annual review of all Nutrient Budgets. An annual review of Nutrient Budgets is neither efficient nor required for resource management systems, where there has been no change associated with farming systems. The Company supports the definition of 'material change' reflected within this relief as it provides clear guidance as to when a review may be required.</p>
Balance Agri-Nutrients Limited 56702	V2 pLWRP-177	Schedule 24(a) Nutrient Management:	<p>Seeks amendments to Schedule 24(a)(i) as follows:</p> <p><i>"(i) A nutrient budget based on soil nutrient tests has been prepared, using OVERSEER in accordance with the OVERSEER Best Practice Data Input Standards [2013], or an equivalent model approved by the Chief Executive of Canterbury Regional Council and shall only need to be reviewed annually where;</i></p> <p><i>(a) The use of land for a farming activity results in a material change defined as an increase in modelled nitrogen or phosphorus losses over a property which exceed 10% over the previous years nutrient budget;</i></p> <p><i>(b) Where the use of land for a farming activity results in a material change as set out in clause (a)(i)(a) above, the nutrient budget shall be updated using OVERSEER or an approved equivalent model in accordance with clause (a)(i);</i></p> <p><i>(c) In the event that the use of land for a farming activity does not result</i></p>	Support (in part)	<p>The RDRML seek that the submission point be <b>allowed</b> for the following reasons:</p> <p>RDRML supports (in principle) the need to provide for a broad range of options to manage and improve flows within the Hinds Drains district.</p> <p>Subject to the acceptance of RDRML's own submission to Schedule 24(a), the Company supports the proposed relief sought by the submitter, given the practical implications for RDRML associated with the annual review of all Nutrient Budgets. An annual review of Nutrient Budgets is neither efficient nor required for resource management systems, where there has been no change associated with farming systems. The Company supports the definition of 'material change' reflected within this relief as it provides clear guidance as to when a review may be required.</p>

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			<p><i>in a material change as set out in clause (a)(i)(a) above, then the nutrient budget shall remain in place for a period of three years, and only require an annual review of input data to confirm the integrity of this information;</i></p> <p><i>(d) Following the three year period set out in (c)(i)(a) above, the nutrient budget shall be formally reviewed in accordance with clause (a)(i).</i></p> <p><i>(e) All updating of nutrient budgets should be conducted by an appropriately qualified and experienced person."</i></p>		