

From: [Eve Williams](#)
To: [Mailroom Mailbox](#)
Cc: [Angela Halliday](#)
Subject: Further Submission on Proposed Plan Change for the Partly Operative Canterbury Land and Water Regional Plan
Date: Friday, 13 May 2016 2:22:48 p.m.
Attachments: [Further Submission on Proposed Plan Change for the Partly Operative Canterbury Land and Water Regional Plan.pdf](#)

Good afternoon

Please find attached a Further Submission on Proposed Plan Change for the Partly Operative Canterbury Land and Water Regional Plan (Plan Change 5) from Horticulture New Zealand. Please acknowledge receipt of this Further Submission.

Best regards
Eve

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Further Submission on Proposed Plan Change for the Partly Operative Canterbury Land and Water Regional Plan

(Closing date: 13 May 2016)

To: Environment Canterbury
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Email: mailroom@ecan.govt.nz

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

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

I do wish to be heard in support of my submission

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

A handwritten signature in blue ink, appearing to read "A Halliday", is written over a dotted line.

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

Date: 13 May 2016

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Central Plains Water Ltd	PC5LWRP-518	PC5	Amend PC5 to ensure flexibility is retained to select on-farm GMP's that are tailored to the property and not overly prescriptive and provide alternative pathway that does not rely on the outputs of the Farm Portal	Support	There is a need to ensure flexibility in how provisions are applied to provide for the range of farming systems that exist in Canterbury and also for systems that are not modelled or provided for through the Farm Portal.
Te Runanga oNgai Tahu	PC5LWRP-724	PC5	Amend PC5 to ensure that the approach to GMP is reviewed every five years to reflect new approaches, innovations and knowledge and any necessary plan changes made plus a range of specific measures listed	Support in part Oppose in part	While it is recognised that there is need to provide for new innovations a five yearly review of the Plan Change and provisions would be onerous and provide uncertainty for users. There needs to be sufficient flexibility provided for in the provisions provide for the range of farming systems that exist in Canterbury.
Canterbury District Health Board	PC5LWRP-1351	PC5	Amend PC 5 to replace 'avoiding' with stronger terminology, e.g. preventing, across all policies	Oppose	Care needs to be taken in the terminology used as a consequence of the King Salmon decision.
Ravensdown Ltd	PC5LWRP-1723	PC5	Undertake a more thorough and robust s32 evaluation of the costs and benefits of PC 5 including an alternative pathway regardless of whether the Farm Portal is 'fixed'	Support	The issues with the Farm Portal are significant and there needs to be flexibility in how provisions are applied to provide for the range of farming systems that exist in Canterbury.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Fonterra Co-operative Group	PC5LWRP-2050	PC5	Amend PC5 policies, rules and associated definitions to remove reliance on the GMP Loss Rates	Support in part	Horticulture NZ is concerned as to how the GMP Loss Rates are intended to be applied in the Plan and that there is inadequate flexibility to provide for the range of farming systems that exist in Canterbury
Federated Farmers of NZ	PC5LWRP-2761	PC5	Amend to incorporate GMP Loss Rate within the FEP process rather than using it as the basis for granting consent.	Support in part	Horticulture NZ is concerned as to how the GMP Loss Rates are intended to be applied in the Plan and that there is inadequate flexibility to provide for the range of farming systems that exist in Canterbury
Te Runanga oNgai Tahu	PC5LWRP-723	Definitions	Amend definition of Accredited Farm Consultant to include requirement to complete course approved by Te Runanga oNgai Tahu that addresses cultural competencies	Support in part/Oppose in part	Horticulture NZ supports the recognition of cultural competencies for farm consultants, however would need more information on the course, its availability, its contents and accessibility before fully supporting this amendment.
Te Runanga oNgai Tahu	PC5LWRP-750	Definitions	Amend definition of Certified Farm Environment Plan Auditor to include requirement to complete course approved by Te Runanga o Ngai Tahu that addresses cultural competencies	Support in part/Oppose in part	Horticulture NZ supports the recognition of cultural competencies for farm consultants, however would need more information on the course, its availability, its contents and accessibility before fully supporting this amendment.
Te Runanga oNgai Tahu	PC5LWRP-752	Definitions	Amend definition of Good Management Practices to address the effects of	Support in part/Oppose	The matters listed should not be included in the definition of Good Management Practices but addressed as necessary through assessment

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			farming activities on mahinga kai, wahi tapu, wahi taonga and the exercise of kaitiakitanga	pose in part	criteria of consents. The Good Management Practices are a way of exercising kaitiakitanga on farm. GMP refers to specific practices, these wider umbrella terms should be used in the explanation.
Dave Ashby Rural Consultants Ltd	PC5LWRP-1078	Definitions	Amend definition of Accredited Farm Consultant as set out in submission	Support in part	Horticulture NZ seeks other amendments to the definition of Accredited Farm Consultant.
Dairy Holdings Ltd	PC5LWRP-166	Definitions	Amend definition of Base line GMP Loss Rate to the highest annual nitrogen loss rate rather than average.	Support in part	Horticulture NZ seeks other amendments to the definition of Base line GMP Loss Rate to ensure that the range of farming systems in Canterbury are adequately provided for.
Dairy Holdings Ltd	PC5LWRP-169	Definitions	Amend definition of Nitrogen Base line to the highest annual nitrogen loss rate	Support in part	Horticulture NZ seeks other amendments to the definition of Nitrogen Base line to ensure that the range of farming systems in Canterbury are adequately provided for.
Dairy Holdings Ltd	PC5LWRP-171	Definitions	Include a definition of nutrient user group	Support in part	The submitter seeks to ensure that the Plan includes provisions for 'nutrient user groups' as a means of compliance with the Plan. This is supported.
Dairy NZ	PC5LWRP-207	Definitions	Amend definition of Baseline GMP Loss Rate to the highest annual nitrogen loss rate rather than average and include provision for a 'loss rate assessed as Baseline GMP' or alternative relief	Support in part	Horticulture NZ seeks other amendments to the definition of Baseline GMP Loss Rate to ensure that the range of farming systems in Canterbury are adequately provided for.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Dairy NZ	PC5LWRP-214	Definitions	Add a definition for 'Loss rate assessed as Baseline GMP'	Support in part	Horticulture NZ seeks other amendments to ensure that the range of farming systems in Canterbury are adequately provided for. The addition of the new definition and related provisions may assist in achieving such an outcome.
Dairy NZ	PC5LWRP-213	Definitions	Add a definition for 'Loss rate assessed as GMP'	Support in part	Horticulture NZ seeks other amendments to ensure that the range of farming systems in Canterbury are adequately provided for. The addition of the new definition and related provisions may assist in achieving such an outcome.
Rangitata Diversion Race Management Ltd	PC5LWRP-467	Definitions	Amend definition of Accredited Farm Consultant	Support in part	Horticulture NZ seeks other amendments to the definition of Accredited Farm Consultant to ensure that there is adequate provision for a range of farm consultants to provide for the range of farming systems in Canterbury.
Rangitata Diversion Race Management Ltd	PC5LWRP-475	Definitions	Amend definition of Certified Farm Environment Plan Auditor	Support in part	Horticulture NZ seeks other amendments to the definition of Certified Farm Environment Plan Auditor to ensure that the audit standards are part of the Plan and open for submission.
Rangitata Dairies	PC5LWRP-744	Definitions	Amend definition of GMP Loss Rates to provide greater flexibility	Support in part	Horticulture NZ seeks other amendments to ensure that the range of farming systems in Canterbury are adequately provided for.
Fertiliser Assoc of NZ	PC5LWRP-864	Definitions	Retain definition of Accredited Farm Consultant	Oppose	Horticulture NZ seeks amendments to the definition of Accredited Farm Consultant to ensure that there is adequate provision for a

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					range of farm consultants to provide for the range of farming systems in Canterbury.
Fertiliser Assoc of NZ	PC5LWRP-1148	Definitions	Include a new definition for Certified Nutrient Management Adviser	Oppose	The submitter seeks to add additional requirements through the addition of Certified Nutrient Management Advisers. While recognition could be made of the Nutrient Management Adviser certification Programme it should not be an additional requirement in the Plan
Fertiliser Assoc of NZ	PC5LWRP-1202	Definitions	Amend definition of Certified Farm Environment Plan Auditor	Oppose in part	Horticulture NZ seeks amendments to the definition of Certified Farm Environment Plan Auditor to ensure that there is adequate provision for a range of farm consultants to provide for the range of farming systems in Canterbury.
Fertiliser Assoc of NZ	PC5LWRP-1241	Definitions	Amend definition of GMP Loss Rates to provide for farm systems which the Farm Portal cannot generate a satisfactory GMP Loss Rate.	Support in part	Horticulture NZ seeks amendments to the definition of GMP Loss Rates to ensure that there is adequate provision for the range of farming systems in Canterbury.
Beef + Lamb NZ	PC5LWRP-1427	Definitions	Amend definition of Audit to be an assessment of the performance of the farming activity in achieving industry agreed GMP practices	Oppose in part	The FEP sets out the appropriate GMP's for the farm system and the audit should be in respect of those GMP's.
Beef + Lamb NZ	PC5LWRP-1430	Definitions	Amend definition of Certified Farm Environment Plan Auditor to add requirements	Oppose in part	The audit criteria in part C Schedule 7 clarify what is required of a Certified Farm Environment Plan

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			for farm risk assessment and FEP auditing.		Auditor so the change to the definition as sought is not necessary.
Ravensdown Ltd	PC5LWRP-1606	Definitions	Include a new definition for Certified Nutrient Management Adviser	Oppose	The submitter seeks to add additional requirements through the addition of Certified Nutrient Management Advisers. While recognition could be made of the Nutrient Management Adviser certification Programme it should not be an additional requirement in the Plan
Ravensdown Ltd	PC5LWRP-1607	Definitions	Amend definition of Certified Farm Environment Plan Auditor	Oppose in part	Horticulture NZ seeks amendments to the definition of Certified Farm Environment Plan Auditor to ensure that there is adequate provision for a range of auditors to provide for the range of farming systems in Canterbury.
Ravensdown Ltd	PC5LWRP-1726	Definitions	Retain definition of Farm Portal if issues with Farm Portal are resolved or amend to provide alternative where Farm Portal is not appropriate	Support in part	Horticulture NZ seeks amendments to the definition of Farm Portal to ensure that there is adequate provision to provide for the range of farming systems in Canterbury, particularly where the Farm Portal is not appropriate for the farming system.
Ravensdown Ltd	PC5LWRP-1727	Definitions	Retain definition of Farm Portal if issues with Farm Portal are resolved or amend to provide alternative where Farm Portal is not appropriate arm Portal	Support in part	Horticulture NZ seeks amendments to the definition of Farm Portal to ensure that there is adequate provision to provide for the range of farming systems in Canterbury, particularly where the Farm Portal is not appropriate for the farming system.
Ravensdown Ltd	PC5LWRP-1730	Definitions	Retain definition of GMP Loss Rate if issues with	Support in part	Horticulture NZ seeks amendments to the definition of GMP Loss Rate to ensure that there

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
			Farm Portal are resolved or amend to provide alternative where Farm Portal is not appropriate arm Portal		is adequate provision to provide for the range of farming systems in Canterbury, particularly where the Farm Portal is not appropriate for the farming system.
Forest and Bird NZ	PC5LWRP-1781	Definitions	Amend definition of Accredited Farm Consultant to clarify and include a schedule outlining competencies required to be considered by the CE of ECAN.	Oppose in part	Horticulture NZ seeks amendments to the definition of Accredited Farm Consultant to ensure that there is adequate provision for a range of farm consultants to provide for the range of farming systems in Canterbury. While schedule outlining competencies required to be considered by the CE of ECAN would assist this would need to be notified as part of a Schedule 1 process.
Fonterra Co-operative Ltd	PC5LWRP-1857	Definitions	Add a definition for 'Loss rate assessed as Baseline GMP'	Support in part	Horticulture NZ seeks other amendments to ensure that the range of farming systems in Canterbury are adequately provided for. The addition of the new definition and related provisions may assist in achieving such an outcome.
Fonterra Co-operative Ltd	PC5LWRP-1854	Definitions	Add a definition for 'Loss rate assessed as GMP'	Support in part	Horticulture NZ seeks other amendments to ensure that the range of farming systems in Canterbury are adequately provided for. The addition of the new definition and related provisions may assist in achieving such an outcome.
Murchison JG and LM	PC5LWRP-1889	Definitions	Amend definition of nitrogen baseline	Support in part	Horticulture NZ seeks an amendment to the definition of nitrogen baseline where the farm

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					system cannot be adequately represented through Overseer and the Farm Portal.
Murchison JG and LM	PC5LWRP-2038	Definitions	Insert new definition for change of land use	Support in part	Horticulture NZ seeks amendments in Policy 4.38B to provide thresholds for change in land use as it is important that there is clarity as to what a change in land use is considered to be.
Irrigation NZ Inc	PC5LWRP-2067	Definitions	Amend definition of Baseline GMP Loss rate by adding 'or a nitrogen loss calculation that demonstrates implementation of GMP's	Support in part	Horticulture NZ seeks an amendment to the definition of Baseline GMP Loss rate where the farm system cannot be adequately represented through Overseer and the Farm Portal. Recognition of implementation of GMP's is important as part of that.
Irrigation NZ Inc	PC5LWRP-2068	Definitions	Amend definition of GMP Loss rate by adding 'or a nitrogen loss calculation that demonstrates implementation of GMP's	Support in part	Horticulture NZ seeks an amendment to the definition of Baseline GMP Loss rate where the farm system cannot be adequately represented through Overseer and the Farm Portal. Recognition of implementation of GMP's is important as part of that.
Dairy Holdings Ltd	PC5LWRP-188	Policies	Insert new policy for where nitrogen loss is greater than baseline GMP Loss Rate or GMP Loss Rate	Support in part	Horticulture NZ is concerned as to how the provisions are intended to be applied in the Plan and that there is inadequate flexibility to provide for the range of farming systems that exist in Canterbury
Dairy Holdings Ltd	PC5LWRP-191	Policies	Insert new policy for nutrient user groups	Support in part	The submitter seeks to ensure that the Plan includes provisions for 'nutrient user groups' as a means of compliance with the Plan. This is supported.

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Dairy Holdings Ltd	PC5LWRP-194	Policies	Insert new policy for where farm enterprises to provide environmental management strategy	Support in part	Clarification is supported regarding farm enterprises but information requirements should be related to the scale and nature of the activity and effects.
Dairy Holdings Ltd	PC5LWRP-246	Policies	Insert new policy for review of Farm Portal to be annually	Support in part	While review of the Farm Portal is supported the need for plan changes and consequential changes to consent is a concern due to increased compliance costs. The provisions in the Plan should provide flexibility where the Farm Portal is not appropriate.
Dairy NZ	PC5LWRP-225	Policy 4.11	Amend Policy 4.11 to provide exceptions for length of consent term for environment benefit	Support in part	There needs to be flexibility in provisions for consent terms and recognition of implementation of GMP's.
Ravensdown Ltd	PC5LWRP-1639	Policy 4.11	Amend Policy 4.11 to establish criteria to be used to determine consent duration while the progressive Implementation Programme is being implemented.	Support in part	There needs to be flexibility in provisions for consent terms and recognition of implementation of GMP's. However criteria should be set through a Schedule 1 process.
Murchison JG and LM	PC5LWRP-1880	Policy 4.11	The submitter seeks to delete Policy 4.11 and a number of other policies are replaced with new policies that establish an alternative framework for the Plan.	Support in part	The alternative framework provides for achieving water quality objectives through a focus on GMP's and farmer actions which are practical. This includes provisions for longer duration consents where appropriate.

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Federated Farmers of NZ	PC5LWRP-2240	Policy 4.34	Amend Policy 4.34 to provide for 'estimated' nutrient loss.	Support in part	Calculating nutrient losses are estimates so the wording is appropriate.
Fish and Game	PC5LWRP-691	Policy 4.34	Amend Policy 4.34 by adding additional clause regarding overseer assumed practices not being met.	Oppose in part	Overseer is not appropriate for all farming systems so the change sought cannot be applied generically across the region.
Ravensdown Ltd	PC5LWRP-1736	Policy 4.36	Amend Policy 4.36 by amending wording	Support	The amended wording is more appropriate
Forest and Bird NZ	PC5LWRP-1798	Policy 4.36	Amend Policy 4.36 by addition of new clauses regarding water quality targets being breached	Oppose	The proposed policy framework adequately provides for the matters sought by the submitter.
Irrigation NZ Inc	PC5LWRP-2081	Policy 4.36	Delete Policy 4.36 b)	Oppose	Policy 4.36 b) provides for permitted activities to prepare a Management Plan in accordance with Schedule 7A. This provision is appropriate for permitted activities.
Meridian Energy Ltd	PC5LWRP-75	Policy 4.37	Add to Policy 4.37 'or the nitrogen baseline, whichever is lesser'	Support in part	Horticulture NZ seeks other amendments to the plan to ensure that the range of farming systems in Canterbury are adequately provided for. The change sought by the submitter would assist.
Dairy NZ	PC5LWRP-239	Policy 4.37	The submitter seeks amendments to Policy 4.37 related to the new definition sought for 'Loss rate assessed as Baseline GMP'	Support in part	Horticulture NZ seeks other amendments to ensure that the range of farming systems in Canterbury are adequately provided for. The addition of the new provisions may assist in achieving such an outcome.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Ballance Agri-Nutrients Ltd	PC5LWRP-431	Policy 4.37	Reword Policy 4.37 by deleting 'avoid'	Support	The wording sought better reflects the intent of the policy
Te Runanga oNgai Tahu	PC5LWRP-792	Policy 4.37	Reword policy to include limits and reduction requirements	Oppose	The purpose of PC 5 is not to set limits – that is the sub regional plan process.
Fonterra Co-operative Ltd	PC5LWRP-716	Policy 4.37	The submitter seeks amendments to Policy 4.37 related to the new definition sought for 'Loss rate assessed as Baseline GMP'	Support in part	Horticulture NZ seeks other amendments to ensure that the range of farming systems in Canterbury are adequately provided for. The addition of the new provisions may assist in achieving such an outcome.
Beef + Lamb NZ	PC5LWRP-1453	Policy 4.37	Amend Policy 4.37 to include greater recognition of GMP's	Support in part	The plan should clearly provide recognition for GMP's.
Ravensdown Ltd	PC5LWRP-1739	Policy 4.37	Reword Policy 4.37 by deleting 'avoid' and providing for alternative pathways from the Farm Portal	Support	The wording sought better reflects the intent of the policy and provides flexibility where the Farm Portal is not appropriate.
Forest and Bird NZ	PC5LWRP-1799	Policy 4.37	Amend exception as provided for in Policy 4.38A and that reduction beyond GMP may be required to achieve freshwater objectives.	Oppose	The provision for Policy 4.38A is appropriate and the plan, along with sub regional plans, sets out actions to achieve freshwater objectives.
Dairy NZ	PC5LWRP-247	Policy 4.38	The submitter seeks amendments to Policy 4.38 related to the new definition	Support in part	Horticulture NZ seeks other amendments to ensure that the range of farming systems in Canterbury are adequately provided for. The

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
			sought for 'Loss rate assessed as Baseline GMP'		addition of the new provisions may assist in achieving such an outcome.
Fonterra Co-operative Ltd	PC5LWRP-725	Policy 4.38	The submitter seeks amendments to Policy 4.38 related to the new definition sought for 'Loss rate assessed as Baseline GMP'	Support in part	Horticulture NZ seeks other amendments to ensure that the range of farming systems in Canterbury are adequately provided for. The addition of the new provisions may assist in achieving such an outcome.
Te Runanga oNgai Tahu	PC5LWRP-812	Policy 4.38	Reword policy to include limits and reduction requirements	Oppose	The purpose of PC 5 is not to set limits – that is the sub regional plan process.
Ravensdown Ltd	PC5LWRP-1740	Policy 4.38	Reword Policy 4.38 to provide for alternative pathways from the Farm Portal	Support	The wording sought better reflects the intent of the policy and provides flexibility where the Farm Portal is not appropriate.
Forest and Bird NZ	PC5LWRP-1800	Policy 4.38	Add to Policy 4.38 b) avoid and mitigate other adverse effects	Oppose	It needs to be clear what adverse effects the policy is seeking to address.
Ravensdown Ltd	PC5LWRP-1741	Policy 4.38AA	Reword Policy 4.38AA to provide for alternative pathways from the Farm Portal	Support	The wording sought better reflects the intent of the policy and provides flexibility where the Farm Portal is not appropriate.
Forest and Bird NZ	PC5LWRP-1801	Policy 4.38AA	Add to Policy 4.38AA b) avoid and mitigate other adverse effects	Oppose	It needs to be clear what adverse effects the policy is seeking to address.
Federated Farmers of NZ	PC5LWRP-2264	Policy 4.38B	Amend Policy 4.38B to provide an alternative pathway for farm systems where the farm portal is not	Support	The plan needs to provide flexibility where the Farm Portal is not appropriate.

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			capable or produces aberrant results		
Amuri Irrigation Company Ltd	PC5LWRP-993	Policy 4.38C	Amend Policy 4.38C to provide an appropriate transition period to achieve GMP loss rates	Support in part	The plan needs to also provide flexibility and appropriate timeframes where the Farm Portal is not appropriate.
Forest and Bird NZ	PC5LWRP-1806	Policy 4.38C	Amend Policy 4.38C to ensure that the baseline GMP loss rates has effect immediately	Oppose	There needs to be adequate transition timeframes.
Dairy Holdings Ltd	PC5LWRP-187	Policy 4.38D	Amend timeframes in Policy 4.38D and provision where the Farm Portal is not accurate or appropriate	Support in part	The plan needs to provide flexibility where the Farm Portal is not appropriate.
Forest and Bird NZ	PC5LWRP-1807	Policy 4.38D	Amend Policy 4.38D to ensure that the baseline GMP loss rates has effect immediately	Oppose	There needs to be adequate transition timeframes.
Federated Farmers of NZ	PC5LWRP-2267	Policy 4.38E	Amend Policy 4.38E to limit consider of P losses where there is potential for erosion	Support in part	The approach sought is more effects based.
Dave Ashby Rural Consultants Ltd	PC5LWRP-1009	Policy 4.40	Amend Policy 4.40 to include Overseer as tool to provide information about respective strategies.	Oppose	Overseer is not appropriate for all farm systems.
Fertiliser Assoc of NZ	PC5LWRP-1355	Policy 4.41	Amend Policy 4.41 by adding clause relating to	Support	The detail required should be related to the level of risk.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
			level of detail related to level of risk for nutrient loss		
Forest and Bird NZ	PC5LWRP-1810	Policy 4.41	Amend Policy 4.41 to include direction for audit requirements	Oppose in part	The audit requirements are set out in Schedule 7.
Ravensdown Ltd	PC5LWRP-701	Policy 4.41A	Amend Policy 4.41A to include requirements for Certified Nutrient Management Adviser	Oppose	The submitter seeks to add additional requirements through the addition of Certified Nutrient Management Advisers. While recognition could be made of the Nutrient Management Adviser Certification Programme it should not be an additional requirement in the Plan
Fertiliser Assoc of NZ	PC5LWRP-1356	Policy 4.41A	Amend Policy 4.41A to include requirements for Certified Nutrient Management Adviser	Oppose	The submitter seeks to add additional requirements through the addition of Certified Nutrient Management Advisers. While recognition could be made of the Nutrient Management Adviser Certification Programme it should not be an additional requirement in the Plan
Forest and Bird NZ	PC5LWRP-1811	Policy 4.41A	Amend Policy 4.41A to delete clause c)	Oppose	Provision for recognition of consents reviewed by and Accredited Farm consultant is appropriate.
Irrigation NZ	PC5LWRP-2123	Policy 4.41A	Amend Policy 4.41A to delete clause c)	Oppose	Provision for recognition of consents reviewed by and Accredited Farm consultant is appropriate.
Dairy NZ	PC5LWRP-263	Policy 4.41B	Amend Policy 4.41B to include and alternative consenting pathway	Support in part	The plan needs to provide flexibility where the Farm Portal is not appropriate.
Te Runanga oNgai Tahu	PC5LWRP-818	Policy 4.41B	Amend Policy 4.41B require that FEP's address the	Oppose in part	The focus of the FEP should be on GMP's to achieving water quality outcomes.

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			effects of farming activities on mahinga kai, and known sites or areas of wahi tapu and wahi taonga		
Ravensdown Ltd	PC5LWRP-1760	Policy 4.41B	Reword Policy 4.41B to provide for alternative pathways from the Farm Portal	Support	The wording sought better reflects the intent of the policy and provides flexibility where the Farm Portal is not appropriate.
Forest and Bird NZ	PC5LWRP-1813	Policy 4.41B	Amend Policy 4.41B to implement more stringent N loss reductions	Oppose in part	Limits are provided through the sub regional plans. PC 5 seeks to implement GMP's.
Irrigation NZ	PC5LWRP-2124	Policy 4.41B	Amend Policy 4.41B to focus on GMP's.	Support in part	The changes sought are appropriate to implement the Plan Change.
Forest and Bird NZ	PC5LWRP-1814	Policy 4.41C	Amend Policy 4.41C to implement more stringent N loss reductions	Oppose in part	Limits are provided through the sub regional plans. PC 5 seeks to implement GMP's.
Orari Water Users Group	PC5LWRP-885	Section 5 Region wide rules	Amend to replace Accredited Farm Consultant with Certified Farm Environment Plan Auditor	Oppose	The roles of the consultant and auditor are different and so need to be described differently. A Farm Consultant could be a FEP auditor but would need to meet both set of competencies.
Fonterra Co-operative Group Ltd	PC5LWRP-1160	Section 5 Region wide rules	Insert new discretionary activity rule for farming enterprise based on Loss Rate Assessed as GMP as an alternative consent pathway to the Farm Portal	Oppose in part	While an alternative pathway to the Farm Portal is supported Horticulture NZ seeks that farm enterprises are not classed as discretionary activities in all zones.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Dairy Holdings Ltd	PC5LWRP-200	Section 5 Region wide rules	Insert new rule for Nutrient user groups	Support	Provision should be made where a collective approach to consenting is appropriate.
Dairy NZ	PC5LWRP-328	Section 5 Region wide rules	Insert new RDA rule for property over 10 ht in red allocation zone that does not meet condition 2 of Rule 5.45A based on Loss Rate Assessed as GMP	Support in part	The new rule provides an alternative pathway to the Farm Portal.
Forest and Bird NZ	PC5LWRP-1816	5.41A	Amend Rule 5.41A or revert to previous Rule 5.41	Oppose	Rule 5.41A provides for situations where a consent has already assessed the activity so additional conditions is double dipping.
Dairy Holdings Ltd	PC5LWRP-196	5.42A	Amend to provide clearer direction where property in more than one allocation zone	Support	The wording sought is clearer.
Sparrow M	PC5LWRP-941	5.42A	Include farm enterprises in Rule 5.42A	Support	Horticulture NZ seeks the inclusion of farm enterprises in a number of rules as the effects of the activity can be effectively managed.
Fertiliser Assoc of NZ	PC5LWRP-1423	5.43A	Add new condition 'subject to complying with Good Management Practices'	Oppose in part	The rule is appropriate as a permitted activity rule for properties under 10 ht
Forest and Bird NZ	PC5LWRP-1821	5.43A	Amend Rule 5.43A or revert to previous Rule 5.43	Oppose	The rule is appropriate as a permitted activity rule for properties under 10 ht
Waitaki Irrigators Collective Ltd	PC5LWRP-827	5.44A	Add permitted activity thresholds as percentages of total farm size – 25% for	Oppose in part	A percentage basis could provide for large areas to be provided for as a permitted activity.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
			irrigation and 10% for winter grazing		
Te Runanga oNgai Tahu	PC5LWRP-833	5.44A	Add a condition to Rule 5.44A that nitrogen loss calculation does not exceed 10kgs per ht per annum	Oppose in part	The rule conditions seek to provide for activities where the effects can be managed through the listed conditions.
Fertiliser Assoc of NZ	PC5LWRP-1424	5.44A	Amend Rule 5.44A to provide for review where there is significant farm system change and provide alternative pathway for farm systems that cannot use the farm portal	Support in part	Properties should not be unfairly penalised because the farm portal is not appropriate to the farming system.
Ravensdown Ltd	PC5LWRP-1771	5.44A	Amend Rule 5.44A to provide for review where there is significant farm system change and provide alternative pathway for farm systems that cannot use the farm portal and include GMP loss rate within the FEP process.	Support in part	Properties should not be unfairly penalised because the farm portal is not appropriate to the farming system.
Forest and Bird NZ	PC5LWRP-1822	5.44A	Delete Rule 5.44A and retain Rule 5.43	Oppose	Rule 5.44A provides for situations where the effects can be managed through the listed conditions.
Dairy NZ	PC5LWRP-314	5.44B	Amend Rule 5.44B to be based on Loss Rate Assessed as GMP	Support in part	The amended rule provides an alternative pathway to the Farm Portal.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Te Runanga oNgai Tahu	PC5LWRP-835	5.44B	Add a condition to Rule 5.44B that nitrogen loss calculation meets Policy 4.37b)	Oppose	The submitter seeks changes to Policy 4.37b) which are not supported.
Canterbury District Health Board	PC5LWRP-1225	5.44B	Amend Rule 5.44B to add trigger threshold	Oppose	It is not clear what trigger level the submitter seeks
Ravensdown Ltd	PC5LWRP-1778	5.44B	Retain Rule 5.44B and provide alternative pathway for farm systems that cannot use the farm portal and include GMP loss rate within the FEP process.	Support in part	Properties should not be unfairly penalised because the farm portal is not appropriate to the farming system.
Forest and Bird NZ	PC5LWRP-1823	5.44B	Delete Rule 5.44B so that activities that do not comply with Rule 5.43 are RDA.	Oppose	Rule 5.44B provides for situations where the effects can be managed through the listed conditions.
Dairy NZ	PC5LWRP-318	5.45A	Amend Rule 5.45A to be based on Loss Rate Assessed as GMP	Support in part	The amended rule provides an alternative pathway to the Farm Portal.
Fonterra Co-operative Group Ltd	PC5LWRP-732	5.45A	Amend Rule 5.45A to be based on Loss Rate Assessed as GMP	Support in part	The amended rule provides an alternative pathway to the Farm Portal.
Te Runanga oNgai Tahu	PC5LWRP-839	5.45A	Add a condition to Rule 5.45A that nitrogen loss calculation meets Policy 4.37b)	Oppose	The submitter seeks changes to Policy 4.37b) which are not supported.
Ravensdown Ltd	PC5LWRP-1779	5.45A	Retain Rule 5.45A and provide alternative pathway for farm systems that cannot	Support in part	Properties should not be unfairly penalised because the farm portal is not appropriate to the farming system.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
			use the farm portal and include GMP loss rate within the FEP process.		
Dairy NZ	PC5LWRP-331	5.46A	Amend Rule 5.46A for farm enterprises to restricted discretionary activity based on Loss Rate Assessed as GMP as an alternative consent pathway to the Farm Portal	Support in part	Horticulture NZ support an alternative pathway to the Farm Portal and lesser than discretionary activity for farm enterprises.
Fonterra Co-operative Group Ltd	PC5LWRP-1076	5.46A	Amend to controlled activity rule for farming enterprise with specified matters of control	Support in part	Horticulture NZ support lesser than discretionary activity for farm enterprises.
Dairy NZ	PC5LWRP-333	5.47A	Amend rule to include condition 1 of Rule 5.45B	Support in part	The rule structure sought provides for assessment of effects of activities that do not meet condition 1 of Rule 5.45B
Ravensdown Ltd	PC5LWRP-1977	5.47A	Amend Rule 5.47A to discretionary activity	Support	A discretionary activity enables the effects of the activity to be adequately assessed.
Fonterra Co-operative Group Ltd	PC5LWRP-737	5.50A	Amend Rule 5.50A to be based on Loss Rate Assessed as GMP	Support	The change sought provides an alternative pathway from the Farm Portal.
Fertiliser Assoc of NZ	PC5LWRP-1520	5.45A	Add new condition 'subject to complying with Good Management Practices'	Oppose in part	The rule is appropriate as a permitted activity rule for properties under 10 ht
Forest and Bird NZ	PC5LWRP-1833	5.53A	Delete Rule 5.53A and retain Rule 5.53	Oppose	Rule 5.53A provides for situations where the effects can be managed through the listed conditions.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Ballance Agri-Nutrients	PC5LWRP-468	5.54A	Amend Rule 5.54A to require portal to be updated every 3 years or where there is a material change to the farm system	Support in part	Where there is a significant change to the farm system then the portal should be updated.
Waitaki Irrigators Collective Ltd	PC5LWRP-830	5.54A	Add permitted activity thresholds as percentages of total farm size – 25% for irrigation and 10% for winter grazing	Oppose in part	A percentage basis could provide for large areas to be provided for as a permitted activity.
Te Runanga oNgai Tahu	PC5LWRP-847	5.54A	Add a condition to Rule 5.54A that nitrogen loss calculation does not exceed 15kg/ht/annum	Oppose in part	The rule is appropriate as a permitted activity rule.
Beef + Lamb NZ	PC5LWRP-1398	5.54A	Add a percentage of 10% of property that can be irrigated where irrigation less than 50 ht.	Oppose in part	The percentage basis would only allow for 5ht of irrigation which effectively negates the provision of the rule
Ravensdown Ltd	PC5LWRP-2003	5.54A	Retain Rule 5.54A and provide alternative pathway for farm systems that cannot use the farm portal and include GMP loss rate within the FEP process.	Support in part	Properties should not be unfairly penalised because the farm portal is not appropriate to the farming system.
Dairy NZ	PC5LWRP-340	5.54B	Amend Rule 5.54B to be based on Loss Rate Assessed as GMP	Support in part	The amended rule provides an alternative pathway to the Farm Portal.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Ravensdown Ltd	PC5LWRP-2005	5.54B	Retain Rule 5.54B and provide alternative pathway for farm systems that cannot use the farm portal and include GMP loss rate within the FEP process.	Support in part	Properties should not be unfairly penalised because the farm portal is not appropriate to the farming system.
Dairy NZ	PC5LWRP-342	5.55A	Amend Rule 5.55A to be based on Loss Rate Assessed as GMP	Support in part	The amended rule provides an alternative pathway to the Farm Portal.
Fonterra Co-operative Group Ltd	PC5LWRP-741	5.55A	Amend Rule 5.55A to be based on Loss Rate Assessed as GMP	Support	The change sought provides an alternative pathway from the Farm Portal.
Ravensdown Ltd	PC5LWRP-2006	5.55A	Retain Rule 5.55A and provide alternative pathway for farm systems that cannot use the farm portal and include GMP loss rate within the FEP process.	Support in part	Properties should not be unfairly penalised because the farm portal is not appropriate to the farming system.
Dairy NZ	PC5LWRP-341	5.56AA	Amend Rule 5.56AA for farm enterprises to restricted discretionary activity	Support in part	Horticulture NZ support lesser than discretionary activity for farm enterprises.
Fonterra Co-operative Group Ltd	PC5LWRP-1082	5.56AA	Amend to controlled activity rule for farming enterprise with specified matters of control	Support in part	Horticulture NZ support lesser than discretionary activity for farm enterprises.
Ravensdown Ltd	PC5LWRP-2009	5.56AA	Retain Rule 5.56AA and provide alternative pathway for farm systems that cannot	Support in part	Properties should not be unfairly penalised because the farm portal is not appropriate to the farming system.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
			use the farm portal and include GMP loss rate within the FEP process.		
Forest and Bird NZ	PC5LWRP-1838	5.56AB	Amend Rule 5.56AB so that activities that exceed their baseline are prohibited	Oppose	Rule 5.56AB provides ability to assess the effects of the activity.
Ravensdown Ltd	PC5LWRP-2010	5.56AB	Amend Rule 5.56AB to discretionary	Support	Discretionary Activity provides ability to assess the effects of the activity.
Fertiliser Assoc of NZ	PC5LWRP-1570	5.57A	Add new condition 'subject to complying with Good Management Practices'	Oppose in part	The rule is appropriate as a permitted activity rule for properties under 10 ht
Irrigation NZ	PC5LWRP-2474	5.57A	Add new condition 'subject to adopting relevant industry Good Management Practices'	Oppose in part	The rule is appropriate as a permitted activity rule for properties under 10 ht
Ballance Agri-Nutrients	PC5LWRP-473	5.57B	Amend Rule 5.57B to require portal to be updated every 3 years or where there is a material change to the farm system	Support in part	Where there is a significant change to the farm system then the portal should be updated.
Waitaki Irrigators Collective Ltd	PC5LWRP-831	5.57B	Add permitted activity thresholds as percentages of total farm size – 25% for irrigation and 10% for winter grazing	Oppose in part	A percentage basis could provide for large areas to be provided for as a permitted activity.
Te Runanga oNgai Tahu	PC5LWRP-860	5.57B	Add a condition to Rule 5.57B that nitrogen loss	Oppose in part	The rule is appropriate as a permitted activity rule.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
			calculation does not exceed 15kg/ht/annum		
Beef + Lamb NZ	PC5LWRP-1417	5.57B	Add a percentage of 10% of property that can be irrigated where irrigation less than 50 ht.	Oppose in part	The percentage basis would only allow for 5ht of irrigation which effectively negates the provision of the rule
Ravensdown Ltd	PC5LWRP-2015	5.57B	Retain Rule 5.57B and provide alternative pathway for farm systems that cannot use the farm portal and include GMP loss rate within the FEP process.	Support in part	Properties should not be unfairly penalised because the farm portal is not appropriate to the farming system.
Canterbury District Health Board	PC5LWRP-1254	5.57C	Amend Rule 5.57C to add trigger threshold	Oppose	It is not clear what trigger level the submitter seeks
Ravensdown Ltd	PC5LWRP-2022	5.57C	Retain Rule 5.57C and provide alternative pathway for farm systems that cannot use the farm portal and include GMP loss rate within the FEP process.	Support in part	Properties should not be unfairly penalised because the farm portal is not appropriate to the farming system.
Dairy NZ	PC5LWRP-348	5.58A	Amend Rule 5.58A to be based on Loss Rate Assessed as GMP	Support in part	The amended rule provides an alternative pathway to the Farm Portal.
Fonterra Co-operative Group Ltd	PC5LWRP-743	5.58A	Amend Rule 5.58A to be based on Loss Rate Assessed as GMP	Support in part	The amended rule provides an alternative pathway to the Farm Portal.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Ravensdown Ltd	PC5LWRP-2025	5.58A	Retain Rule 5.58A and provide alternative pathway for farm systems that cannot use the farm portal and include GMP loss rate within the FEP process.	Support in part	Properties should not be unfairly penalised because the farm portal is not appropriate to the farming system.
Dairy NZ	PC5LWRP-349	5.58B	Amend Rule 5.58B to be based on Loss Rate Assessed as GMP	Support in part	The amended rule provides an alternative pathway to the Farm Portal.
Fonterra Co-operative Group Ltd	PC5LWRP-1084	5.58B	Amend to controlled activity rule for farming enterprise with specified matters of control	Support in part	Horticulture NZ support lesser than discretionary activity for farm enterprises.
Ravensdown Ltd	PC5LWRP-2033	5.58B	Retain Rule 5.58B and provide alternative pathway for farm systems that cannot use the farm portal and include GMP loss rate within the FEP process.	Support in part	Properties should not be unfairly penalised because the farm portal is not appropriate to the farming system.
Ravensdown Ltd	PC5LWRP-2034	5.59A	Amend Rule 5.59A to discretionary	Support	Discretionary Activity provides ability to assess the effects of the activity.
Forest and Bird NZ	PC5LWRP-1782	Section 16 Schedules	Amend to include schedule outlining knowledge and competencies required for approval of Accredited Farm Consultants	Oppose in part	While the competencies need to be clear they should be developed through a Schedule 1 process.
Dairy NZ	PC5LWRP-354	Schedule 7 FEP	Amend Schedule 7 as set out in submission	Support in part	The changes sought reflect best practice

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Te Runanga oNgai Tahu	PC5LWRP-861	Schedule 7 FEP	Amend Schedule 7 to include new management area to address the effects of farming activities on mahinga kai, wahi tapu, wahi taonga	Oppose in part	GMP refers to specific practices, these wider cultural umbrella terms should be addressed in an explanation.
Canterbury District Health Board	PC5LWRP-1272	Schedule 7 FEP	Amend Schedule 7 FEP add trigger threshold such as half the maximum acceptable value for nitrate	Oppose	Schedule 7 FEP is not appropriate location for trigger levels.
Beef + Lamb NZ	PC5LWRP-1553	Schedule 7 FEP	Amend Schedule 7 FEP to delete definition of Management Area and refer to practices	Support	The rewording is more appropriate.
Fertiliser Assoc of NZ	PC5LWRP-1593	Schedule 7 FEP	Amend Schedule 7 FEP to add Certified Nutrient Management Adviser Provide alternative to Farm Portal	Oppose in part	Addition of Certified Nutrient Management Adviser is opposed as unnecessary but addition of alternative to Farm Portal is supported.
Forest and Bird NZ	PC5LWRP-1846	Schedule 7 FEP	Amend Schedule 7 FEP to amend Management Area to refer to practices or topics	Support in part	The meaning of Management Areas is unclear.
Ravensdown Ltd	PC5LWRP-2042	Schedule 7 FEP	Provide alternative to Farm Portal	Support	The addition of alternative to Farm Portal is supported.
NZ Deer Farmers Assoc	PC5LWRP-2094	Schedule 7 FEP	Amend Schedule 7 FEP as set out in submission	Support in part	The deletion of maximising nutrient use efficiency and the amount and rate of fertiliser applied does

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
				Oppose in part	not exceed the agronomic requirements of the crop is not supported as it is best practice. Other changes sought are supported as they clarify the schedule requirements.
Irrigation NZ Inc	PC5LWRP-2176	Schedule 7 FEP	Amend Schedule 7 FEP as set out in submission	Support in part	Changes sought are supported as they clarify the schedule requirements and provide for irrigation to apply at their optimal efficiency which is best practice.
Federated Farmers of NZ	PC5LWRP-2325	Schedule 7 FEP	Amend Schedule 7 FEP as set out in submission	Support in part	The focus on potential for erosion is more effects based.
Fish and Game	PC5LWRP-707	Schedule 7A	Amend Schedule 7A to add additional methods	Oppose	Schedule 7A is appropriate for the activities that require a Management Plan
Te Runanga oNgai Tahu	PC5LWRP-863	Schedule 7A	Amend Schedule 7A to include new management area to address the effects of farming activities on mahinga kai, wahi tapu, wahi taonga	Oppose in part	GMP refers to specific practices, these wider cultural umbrella terms should be addressed in an explanation.
Irrigation NZ Inc	PC5LWRP-2177	Schedule 7A	Delete Schedule 7A	Oppose	Schedule 7A is appropriate for the activities that require a Management Plan
Federated Farmers of NZ	PC5LWRP-2326	Schedule 7A	Delete Schedule 7A	Oppose	Schedule 7A is appropriate for the activities that require a Management Plan
Hunter Downs Development Co	PC5LWRP-141	Schedule 28	Amend the Explanation of Schedule 28 to identify limitations	Support in part	The limitations of the Farm Portal need to be clearly stated.

Submitter Name	Sub point ID	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Dairy NZ	PC5LWRP-308	Schedule 28	Amend the Explanation of Schedule 28 to identify limitations	Support in part	The limitations of the Farm Portal need to be clearly stated.
Amuri Irrigation Co Ltd	PC5LWRP-964	Schedule 28	Amend PC5 following independent peer review of Farm Portal and modelling rules in Schedule 28	Support	Horticulture NZ has concerns with the ability to apply Schedule 28 and the Farm Portal to horticultural activities.
Ravensdown Ltd	PC5LWRP-2053	Schedule 28	Delete the contents of Schedule 28 and populate when modelling issues are resolved.	Support	Horticulture NZ has concerns with the ability to apply Schedule 28 and the Farm Portal to horticultural activities.