

From: [Ryan Hepburn](#)
To: [Mailroom Mailbox](#)
Cc: [Treena Davidson](#)
Subject: Te Runanga o Ngai Tahu and Nga Runanga further submissions on Plan Change 5 of the CLWRP
Date: Friday, 13 May 2016 3:51:11 p.m.
Attachments: [image001.gif](#)
[Te Runanga o Ngai Tahu and Nga Runanga further submission on PC5 of the CLWRP.pdf](#)

Kia ora,

Please find attached the further submissions of Te Runanga o Ngai Tahu and Nga Runanga for Plan Change 5 of the Canterbury Land and Water Regional Plan.

Nga mihi,

Ryan

*Environmental Advisor
Te Runanga o Ngai Tahu
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New Zealand*



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Form 6: Further Submissions in support of, or in opposition to, submission on a Publicly Notified Regional Plan under Clause 7 of Schedule 1 of the Resource Management Act 1991

FURTHER SUBMISSIONS ON PLAN CHANGE 5 TO THE CANTERBURY LAND AND WATER REGIONAL PLAN

13 May 2016

To: Plan Change 5 to the Canterbury Land and Water Regional Plan
Environment Canterbury
PO Box 345
Christchurch 8140
Further submission lodged by email – mailroom@ecan.govt.nz

Name of person making submission:

Ngā rūnanga - Te Rūnanga o Kaikōura, Te Ngāi Tūāhuriri Rūnanga, Te Hapū o Ngāti Wheke, Te Rūnanga o Koukourārata, Ōnuku Rūnanga, Wairewa Rūnanga, Te Taumutu Rūnanga, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki;

Ngāi Tahu Farming Limited; and

Te Rūnanga o Ngāi Tahu (Te Rūnanga)

Collectively referred to as Ngāi Tahu.

We have been allocated Submitter ID Number **C16C/32679** [your reference].

These are further submissions in support or opposition to submissions on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan.

We are representing a person who has an interest in the proposal that is greater than the general public has.

Introduction and Background

Ngāi Tahu is Tangata Whenua of Canterbury Region. Ngāi Tahu means “people of Tahu”. Ngāi Tahu is the iwi comprised of Ngāi Tahu Whānui; that is the collective of the individuals who descend from the five primary hapū; Ngāti Kuri, Ngāti Irakehu, Kati Huirapa, Ngāi Tūāhuriri and Ngāi Te Ruahikihiki. The Ngāi Tahu takiwā extends over 80 per cent of Te Waipounamu. Te Waipounamu has been home to Ngāi Tahu for over 800 years.

Te Rūnanga o Ngāi Tahu (Te Rūnanga) is statutorily recognised as the representative tribal body of Ngāi Tahu whānui and was established as a body corporate on 24th April 1996 under section 6 of Te Rūnanga o Ngāi Tahu Act 1996 (the Act).

We note for the Canterbury Regional Council the following relevant provisions of the Act:

Section 3 of the Act States:

This Act binds the Crown and every person (including any body politic or corporate) whose rights are affected by any provisions of this Act.



Section 15(1) states:

Te Rūnanga o Ngāi Tahu shall be recognised for all purposes as the representative of Ngāi Tahu Whānui.

The Charter of Te Rūnanga o Ngāi Tahu established under the Act constitutes Te Rūnanga as the kaitiaki of the tribal interests.

Te Rūnanga respectfully requests that Canterbury Regional Council accord this response the status and weight due to the tribal collective, Ngāi Tahu whānui, currently comprising over 55,000 members, registered in accordance with section 8 of the Act.

Notwithstanding its statutory status as the representative voice of Ngāi Tahu whānui “for all purposes”, Te Rūnanga accepts and respects the right of individuals and Papatipu Rūnanga to make their own responses in relation to this matter.

It should be noted that in Section 15 (2) of the Act, the provision provides for; where any enactment requires consultation with any iwi or with any iwi authority, that consultation shall, with respect to matters affecting Ngāi Tahu Whānui, be held with Te Rūnanga o Ngāi Tahu. Section 15 (3) of the Act requires that in carrying out any consultation Te Rūnanga o Ngāi Tahu shall in turn consult with Papatipu Rūnanga. In practice, Te Rūnanga takes into account the views of Papatipu Rūnanga when determining its position. In the case of issues of local significance only, Te Rūnanga may defer a response completely to Papatipu Rūnanga.

Papatipu Rūnanga are defined in section 9 of the Act. This includes Te Rūnanga o Kaikōura, Te Ngāi Tūāhuriri Rūnanga, Te Hapū o Ngāti Wheke, Te Rūnanga o Koukourārata, Ōnuku Rūnanga, Wairewa Rūnanga, Te Taumutu Rūnanga, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki.

We support or oppose the submission points set out in Schedule One.

The reasons for our support or opposition are also set out in Schedule One.

We seek that the submissions supported in Schedule 1 be allowed.

We seek that the submissions opposed in Schedule 1 be disallowed.



We DO wish to be heard in support of our further submission.

Signature of person authorised to sign on behalf of persons making further submission.

Kara Edwards
General Manager | Te Ao Tūroa
Te Rūnanga o Ngāi Tahu

Date: 13 May

Address for service:

Treena Davidson
Te Rūnanga o Ngāi Tahu
PŌ Box 13 046
Ōtautahi
Christchurch 8021

Email: Treena.davidson@Ngaitahu.iwi.nz

SCHEDULE 1

Ngāi Tahu support or oppose the submission of:	Particular parts of submission supported or opposed:	Reason for support or opposition	Support or oppose
PART A			
DairyNZ PO Box 85066, Lincoln University, 7647	PC5LWRP-216 Definitions, Translations and Abbreviations - <u>Nitrogen Baseline</u>	Water quality has declined across much of Canterbury since the Ngāi Tahu Settlement. The inclusion of the words 'calculated as the highest annual loss' risks greater nitrogen leaching than using an averaged loss.	Oppose
Forest and Bird NZ PO Box 2516, Christchurch j.miller@forestandbird.org.nz	PC5LWRP-1790 Definitions, Translations and Abbreviations - <u>Nitrogen Baseline</u>	The definition of the nitrogen baseline should provide for farming activities, including dairy, that may hold a resource consent obtained between 01 January 2009 and 31 December 2013 and should be assessed on the basis that their farming activity is operational.	Oppose
Federated Farmers of NZ and Others P.O. Box 414, Ashburton 7740	PC5LWRP-2236 Definitions, Translations and Abbreviations - <u>Nitrogen Baseline</u>	Water quality has declined across much of Canterbury since the Ngāi Tahu Settlement. The inclusion of the words 'calculated at the greatest loss' risks greater nitrogen leaching than using an averaged discharge.	Oppose
Dairy Holdings Ltd c/- Ben Williams, Chapman Tripp, PO Box 2510, Christchurch 8041	PC5LWRP-246 Policies	The addition of an annual review of the Portal will ensure that the proxy are up to date and reflect current Good Management Practice.	Support
Central Plains Water Ltd c/- Ben Williams, Chapman Tripp, PO Box 2510, Christchurch 8041	PC5LWRP-631 Insert new policy	Agree that a provision be added specifically providing for farm enterprises however as part of the resource consent process a farm enterprises should show how it will reduce their nitrogen loss rate and operate at better than Good Management Practice.	Support
Irrigation NZ Inc and Others Lincoln Research Centre, PO Box 69119	PC5LWRP-2132 Insert new policy	Agree that consents for the discharge of nutrients should describe the methods that will be used to implement Good Management Practice across all land that will be supplied with water from the scheme or water supplier.	Support
Irrigation NZ Inc and Others	PC5LWRP-2135 Insert new policy	Agree that there should be consistency between the water quantity provisions and water quality provisions in the Canterbury Land and Water Regional Plan.	Support
DairyNZ	PC5LWRP-225 4.11	Policy 4.11 enables Environment Canterbury to have particular regard to the visions and principles of the zone committees. For this reason do not agree with granting a resource consent for a duration of 15 years in the Green Zone. However, recognise there may be the	Oppose

			need for exceptions for all zones where significant environmental benefits may be obtained by having a longer resource consent duration.	
Central Plains Water Ltd.	PC5LWRP-605 4.11		Policy 4.11 enables Environment Canterbury to have particular regard to the visions and principles of the zone committees so do not support its deletion.	Oppose
Fonterra Co-operative Group Ltd and Others <i>PO Box 417, Wellington 6140</i>	PC5LWRP-1074 4.11		Policy 4.11 enables Environment Canterbury to have particular regard to the visions and principles of the zone committees. For this reason do not agree with granting a resource consent for a duration of 15 years in the Green Zone. However, recognise there may be the need for exceptions for all zones where significant environmental benefits may be obtained by having a longer resource consent.	Oppose
Federated Farmers of NZ and Others	PC5LWRP-2238 4.11		Do not agree with deletion of Policy 4.11 as it enables Environment Canterbury to have particular regard to the visions and principles of the zone committees.	Oppose
Federated Farmers of NZ and Others	PC5LWRP-2252 4.37		Many water bodies within the Lake Zone are significant to Ngāi Tahu. For this reason do not support a permitted activity discharge of nitrogen occurring.	Oppose
DairyNZ	PC5LWRP-247 4.38		While support that amendment to improve water quality within the Lake Zone, do not support it being subject to the same provisions as those for the Orange Zone. Many water bodies within the Lake Zone are significant to Ngāi Tahu.	Oppose
Forest and Bird NZ	PC5LWRP-1800 4.38		Agree that recognition of the need to avoid or mitigate other adverse effects is needed.	Support
Ellesmere Sustainable Agriculture Inc. <i>c/- Ms C M Barnett, Lakeside, R D 3, Leeston 7683</i> <i>Email: carey.barnett@xtra.co.nz</i>	PC5LWRP-273 4.38AA		Do not agree that that policy be deleted in its entirety.	Oppose
Beef and Lamb NZ Ltd and Others	PC5LWRP-1494 4.38AA		Do not agree Schedule 7 of the Canterbury Land and Water Regional Plan being amended to reflect just Good Management Practice. Using Management Areas provides more than what is currently defined as Good Management Practice, for example the effects on cultural landscapes and value management areas.	Oppose
Forest and Bird NZ	PC5LWRP-1802 4.38AB		Agree that this policy be retained.	Support
Federated Farmers of NZ and Others	PC5LWRP-2262 4.38A		Many water bodies within the Lake Zone are significant to Ngāi Tahu. For this reason do not agree with the Lake Zone being treated in the same manner as the Red, Orange, Green or Light Blue Zone.	Oppose
Fertiliser Association of NZ <i>PO Box 11519, Manners Street</i>	PC5LWRP-1293 4.38B		Do not agree that this policy be deleted as it provides the requirement for property owners to submit information to the Portal and for this information to be periodically monitored.	Oppose

<i>Central, Wellington, 6142</i>			
Fertiliser Association of NZ	PC5LWRP-1294 4.38C	Do not agree with extending timeframes for meeting Baseline Good Management Practice loss rates.	Oppose
DairyNZ	PC5LWRP-260 4.38D	Consider the dates for commencing Good Management Practice Loss Rates appropriate.	Oppose
Forest and Bird NZ	PC5LWRP-1808 4.38E	Agree that property owners should identify when making a resource consent application any further areas where phosphorus loss is likely and the management of that loss.	Support
North Canterbury Fish and Game and SI Fish and Game <i>PO Box 50, Woodend 7641 and PO Box 150, Temuka 7948</i>	PC5LWRP-697 5.41A	Agree with the use of whole catchment review of land use consents as a means of maintaining or improving water quality or meeting plan limits.	Support
DairyNZ	PC5LWRP-263 4.41B	Agree there is merit to an additional formal process for reviewing and moderating random Portal results that is developed and agreed with stakeholders and that this is to be used where Environment Canterbury has an indication that the Baseline Good Management Practice Loss Rate calculated is inaccurate or the consent applicant considers this to be the case.	Support
Forest and Bird NZ	PC5LWRP-1813 4.41B	Agree that there should be progressively more stringent nitrogen losses.	Support
Dairy Holdings Ltd	PC5LWRP-192 4.41C	Do not agree with just managing water quality. Water quality within the Orange, Green and Light Blue Zones should be maintained not just managed.	Oppose
DairyNZ	PC5LWRP-313 5.43A	Agree that all land users be expected to operate at, at the least, industry agreed Good Management Practice.	Support
Fonterra Co-Operative Group Ltd and Others	PC5LWRP-1160 Section 5 – Region wide rules	Agree that provision is added specifically providing for farm enterprises. However seek as part of the resource consent process farm enterprises show how they will reduce their nitrogen loss rate and operate at better than Good Management Practice.	Support
North Canterbury Fish and Game and SI Fish and Game	PC5LWRP-698 5.44A	Agree to there being limits on winter grazing.	Support
DairyNZ	PC5LWRP-335 5.49A	Agree that all land users be expected to operate at, at the least, industry agreed Good Management Practice.	Support
DairyNZ	PC5LWRP-339	Agree that all land users be expected to operate at, at the least, industry agreed Good Management Practice.	
DairyNZ	PC5LWRP-344 5.57A	Agree that all land users be expected to operate at, at the least, industry agreed Good Management Practice.	

Beef and Lamb NZ Ltd and Others	PC5LWRP-1553 Schedule 7 Farm Environment Plan	Do not agree Schedule 7 of the Canterbury Land and Water Regional Plan being amended to reflect just Good Management Practice. Using Management Areas provides more than what is currently defined as Good Management Practice, for example the effects on cultural landscapes and value management areas.	Oppose
DairyNZ	PC5LWRP-308 Schedule 28 Good Management Practice Modelling Rules	Agree that the modeling within Schedule 28 is endorsed through a group such as the Good Management Practice Governance Group.	Support
Fonterra Co-Operative Group Ltd and Others	PC5LWRP-1853 Schedule 28 Good Management Practice Modelling Rules	Agree that the proxies in Schedule 28 should produce reliable Good Management Practice loss rates.	Support
Forest and Bird NZ	PC5LWRP-1849 Planning Maps 7	Agree that the maps should be clear and locations easy to identify.	Support
PART B - WAITAKI			
Canterbury District Health Board C/- Keith Turner and Alison Paterson, CPH, PO Box 1475, Christchurch 8140	PC5LWRP-1321 Part B	Agree values should be included for cyanobacteria where rivers and lakes are used for drinking water, recreation and mahinga kai.	Support
Canterbury District Health Board	PC5LWRP-1322 Part B	Agree E 'coli levels should not exceed Microbiological Assessment Category D value where wells are used for drinking water.	Support
Canterbury District Health Board	PC5LWRP-1323 Part B	Agree that a longer term target should be set for wells used for drinking water.	Support
DairyNZ	PC5LWRP- 398 15B.4.2	Do not agree with amending to manage. Wāhi tapu and wahi taonga values in the Waitaki Sub-region should be protected not just managed.	Oppose
Ravensdown Ltd and Others Chris Hansen Consultants Ltd, P O Box 51-282, Tawa, Wellington 5249	PC5LWRP-2070 15B.4.2	Agree that wāhi tapu and wāhi taonga should be protected from the adverse effects of water use.	Support
Fonterra Co-operative Group Ltd and Others	PC5LWRP-2122 15B.4.4	Any decision to transfer water would need to take into account the downstream effects on Whitney's Creek.	Oppose
Ravensdown Ltd and Others	PC5LWRP-2073 15B.4.10	Do not agree with just managing nutrient losses. Farming activities should be directed to minimise not just manage nutrient losses.	Oppose
DairyNZ	PC55LWRP-402	Concern an adaptive management approach, with a focus on Good Management Practice may	Oppose

	15B.4.12	not result over time in a decrease in the amount of nitrogen.	
DairyNZ	PC5LWRP-403 15B.4.13	Do not agree nitrogen loss should be calculated at the highest annual nitrogen loss that occurred in the four years prior to 14 February 2016.	Oppose
Forest and Bird NZ	PC5LWRP-1888 15B.4.12	Agree that the calculation of the grant of consent should be based on lawful exceedance that existed at 13 February 2016.	Support
DairyNZ	PC5LWRP-406 15B.4.16	Concern that consents granted for a period of more than 15 years may mean that water quality cannot be maintained or improved.	Oppose
Ravensdown Ltd and Others	PC5LWRP-2089 15B.4.16	Concern that consents granted for a period of more than 15 years may mean that water quality cannot be maintained or improved.	Oppose
Federated Farmers of NZ and Others	PC5LWRP-2336 15B.4.16	Concern that consents granted for a period of more than 15 years may mean that water quality cannot be maintained or improved.	Oppose
Meridian Energy Ltd <i>PO Box 2146, Christchurch 8140</i>	PC5LWRP-61 15B.4.18	Agree that the total Nitrogen Load Limits for the relevant zones are not to be exceeded, irrespective of how any allocation or distribution of Nitrogen Headroom occurs.	Support
Director General of Conservation	PC5LWRP-18 15B.4.18	Agree that a provision is needed to maintain freshwater habitat quality through riparian buffer strips, native planting, fencing of springheads and spring-fed waterways and use of artificial wetlands where appropriate. This may result also in freshwater quality being improved.	Support
Director General of Conservation	PC5LWRP-1571 15B.4.19	Agree there should be protection of threatened native fish habitats from adverse effects.	Support
Meridian Energy Ltd	PC5LWRP-76 15B.4.20	Agree that the total Nitrogen Load Limits for the relevant zones are not to be exceeded, irrespective of how any allocation or distribution of Nitrogen headroom occurs.	Support
Federated Farmers of NZ and Others	PC5LWRP-2341 15B.4.20	Concern as to whether or not water quality will be maintained or improved if a degree of flexibility is provided to farming activities in order to accommodate the normal cyclical nature of farming and adjustments to land use in response to physical conditions and markets.	Oppose
Meridian Energy Ltd	PC5LWRP-64 15B.4.21	Agree that the total Nitrogen load limits for the relevant zones are not to be exceeded, irrespective of how any allocation or distribution of Nitrogen headroom occurs.	Support
Meridian Energy Ltd	PC5LWRP-65 15B.4.22	Agree that the total Nitrogen Load Limits for the relevant zones are not to be exceeded, irrespective of how any allocation or distribution of Nitrogen headroom occurs.	Support
Federated Farmers of NZ and Others	PC5LWRP-2342 15B.4.22	Concern as to whether or not water quality will be maintained or improved if a degree of flexibility is provided to farming activities in order to accommodate the normal cyclical nature of farming and adjustments to land use in response to physical conditions and markets.	Oppose

K.E.

Mackenzie District Council C/- Nathan Hole, P O Box 52, Main Street, Fairlie 7949	PC5LWRP-366 15B.4.23	Agree that significant biodiversity in the Haldon Zone and Mid Catchment should be protected.	Support
Director General of Conservation	PC5LWRP-1605 15B.4.24	Agree there should be protection of threatened native fish habitats from adverse effects.	Support
Director General of Conservation	PC5LWRP-1608 15B.4.25	Agree there should be protection of threatened native fish habitats from adverse effects.	Support
Director General of Conservation	PC5LWRP-1575 15B.4.26	Agree there should be protection of threatened native fish habitats from adverse effects.	Support
Federated Farmers of NZ and Others	PC5LWRP-2560 15B.4.27	Concern that the wording proposed does not provide clear message to Plan users as to where a resource consent may be declined.	Oppose
Waitaki Irrigators Collective Ltd and Others PO Box 159, Ōamaru elizabeth@waitakirrigators.co.nz	PC5LWRP-786 15B.5 Rules	Concern the new rule proposed is not clear on what would constitute an incidental nutrient discharge associated with an authorised discharge.	Oppose
Forest and Bird NZ	PC5WLRP-1918 15B.5.9	Agree that Rule should be retained as notified.	Support
Fertiliser Association of NZ	PC5WLRP-1640 15B.5.11	Do not agree with removing the prohibited status. The move from prohibited to discretionary will not result in water quality being maintained or improved. It is appropriate that in some areas activities with high nutrient losses should not occur.	Oppose
Fertiliser Association of NZ	PC5LWRP-1645 15B.5.13B	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.	Oppose
Ravensdown Ltd and Others	PC5LWRP-2169 15B.5.13B	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.	Oppose
Federated Farmers of NZ and Others	PC5LWRP-2369 15B.5.13B	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.	Oppose
Federated Farmers of NZ and Others	PC5LWRP-2575 15B.5.14	Do not agree with replacing permitted activity criteria for irrigation and winter grazing with the requirement to meet Industry Good Management Practice by 30 June 2020	Oppose
Forest and Bird NZ	PC5LWRP-1926 15B.5.16	Agree to inclusion of clause that provides for significant indigenous biodiversity.	Support
Fertiliser Association of NZ	PC5LWRP-1655 15B.5.17	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.	Oppose
Ravensdown Ltd and Others	PC5LWRP-2183 15B.5.17	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.	Oppose

		maintained or improved.		
Fertiliser Association of NZ	PC5LWRP-1656 15B.5.18	Do not agree with removing the prohibited status. It is appropriate that in some areas activities with high nutrient losses should not occur.		Oppose
Ravensdown Ltd and Others	PC5LWRP-2184 15B.5.18	Do not agree with removing the prohibited status. It is appropriate that in some areas activities with high nutrient losses should not occur.		Oppose
Federated Farmers of NZ and Others	PC5LWRP-2379 15B.5.20	Do not agree to removing clause that relates to the need to assess the effects of farming on areas of significant indigenous biodiversity.		Oppose
Fertiliser Association of NZ	PC5LWRP-1666 15B.5.22	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.		Oppose
Ravensdown Ltd and Others	PC5LWRP-2194 15B.5.22	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.		Oppose
Fertiliser Association of NZ	PC5LWRP-1668 15B.5.23	Do not agree with removing the prohibited status. It is appropriate that in some areas activities with high nutrient losses should not occur.		Oppose
Ravensdown Ltd and Others	PC5LWRP-2195 15B.5.23	Do not agree with removing the prohibited status. It is appropriate that in some areas activities with high nutrient losses should not occur.		Oppose
DairyNZ	PC5LWRP-503 15B.5.24	Do not agree that irrigation or winter grazing within the Hakataramea River Zone or Hakataramea Hill Zone should be a permitted activity.		Oppose
Ravensdown Ltd and Others	PC5LWRP-2196 15B.5.24	Do not agree that irrigation or winter grazing within the Hakataramea River Zone or Hakataramea Hill Zone should be a permitted activity.		Oppose
Fertiliser Association of NZ	PC5LWRP-1693 15B.5.28	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.		Oppose
Ravensdown Ltd and Others	PC5LWRP-2201 15B.5.28	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.		Oppose
Fertiliser Association of NZ	PC5LWRP-1694 15B.5.29	Do not agree with removing the prohibited status. It is appropriate that in some areas activities with high nutrient losses should not occur.		Oppose
Ravensdown Ltd and Others	PC5LWRP-2201 15B.5.29	Do not agree with removing the prohibited status. It is appropriate that in some areas activities with high nutrient losses should not occur.		Oppose
Forest and Bird NZ	PC5LWRP-1942 15B.5.31	Agree to inclusion of clause that provides for significant indigenous biodiversity.		Support
Ravensdown Ltd and Others	PC5LWRP-2206	Concern the move from non-complying to discretionary will not result in water quality being		Oppose

	15B.5.32	maintained or improved.	
Fertiliser Association of NZ	PC5LWRP-1697 15B.5.32	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.	Oppose
Fertiliser Association of NZ	PC5LWRP-1698 15B.5.33	Do not agree with removing the prohibited status. It is appropriate that in some areas activities with high nutrient losses should not occur.	Oppose
Ravensdown Ltd and Others	PC5LWRP-2207 15B.5.33	Do not agree with removing the prohibited status. It is appropriate that in some areas activities with high nutrient losses should not occur.	Oppose
Forest and Bird NZ	PC5LWRP-1947 15B.5.35	Agree to inclusion of clause that provides for significant indigenous biodiversity.	Support
Ravensdown Ltd and Others	PC5LWRP-2211 15B.5.37	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.	Oppose
Fertiliser Association of NZ	PC5LWRP-1702 15B.5.37	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.	Oppose
Fertiliser Association of NZ	PC5LWRP-1703 15B.5.38	Do not agree with removing the prohibited status. It is appropriate that in some areas activities with high nutrient losses should not occur.	Oppose
Ravensdown Ltd and Others	PC5LWRP-2212 15B.5.38	Do not agree with removing the prohibited status. It is appropriate that in some areas activities with high nutrient losses should not occur.	Oppose
Forest and Bird NZ	PC5LWRP-1951 15B.5.40	Agree to inclusion of clause that provides for significant indigenous biodiversity.	Support
Ravensdown Ltd and Others	PC5LWRP-2217 15B.5.42	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.	Oppose
Fertiliser Association of NZ	PC5LWRP-1707 15B.5.42	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.	Oppose
Forest and Bird NZ	PC5LWRP-1956 15B.5.45	Agree to inclusion of clause that provides for significant indigenous biodiversity.	Support
Ravensdown Ltd and Others	PC5LWRP-2221 15B.5.47	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.	Oppose
Fertiliser Association of NZ	PC5LWRP-1712 15B.5.47	Concern the move from non-complying to discretionary will not result in water quality being maintained or improved.	Oppose
Fertiliser Association of NZ	PC5LWRP-1713 15B.5.48	Do not agree with amending provision to provide for any further surface water takes in the catchment upstream of the existing take.	Oppose

Ravensdown Ltd and Others	PC5LWRP-2222 15B.5.48	Do not agree with amending provision to provide for any further surface water takes in the catchment upstream of the existing take.	Oppose
Fertiliser Association of NZ	PC5LWRP-1720 Table 15B(a)	Agree that table should be retained as it is an important part of interpretation and implementation of the rules but able to be amended.	Support
Ravensdown Ltd and Others	PC5LWRP-2223 Table 15B(a)	Agree that table should be retained as it is an important part of interpretation and implementation of the rules but able to be amended.	Support
Fertiliser Association of NZ	PC5LWRP-1721 Table 15B(b)	Agree that table should be retained as it is an important part of interpretation and implementation of the rules but able to be amended.	Support
Fertiliser Association of NZ	PC5LWRP-1722 Table 15B(c)	Agree that table should be retained as it is an important part of interpretation and implementation of the rules but able to be amended.	Support
Fertiliser Association of NZ	PC5LWRP-1725 Table 15B(d)	Agree that table should be retained as it is an important part of interpretation and implementation of the rules but able to be amended.	Support
Fertiliser Association of NZ	PC5LWRP-1728 Table 15B(e)	Agree that table should be retained as it is an important part of interpretation and implementation of the rules but able to be amended.	Support
Fertiliser Association of NZ	PC5LWRP-1729 Table 15B(f)	Agree that table should be retained as it is an important part of interpretation and implementation of the rules but able to be amended.	Support
Fertiliser Association of NZ	PC5LWRP-1731 Table 15B(g)	Agree that table should be retained as it is an important part of interpretation and implementation of the rules but able to be amended.	Support
Fertiliser Association of NZ	PC5LWRP-1732 Table 15B(h)	Agree that table should be retained as it is an important part of interpretation and implementation of the rules but able to be amended.	Support
Fertiliser Association of NZ	PC5LWRP-1733 Table 15B(i)	Agree that table should be retained as it is an important part of interpretation and implementation of the rules but able to be amended.	Support
Fertiliser Association of NZ	PC5LWRP- [requested in submission but not captured in summary] Table 15B(j)	Agree that table should be retained as it is an important part of interpretation and implementation of the rules but able to be amended.	Support
DairyNZ	PC5LWRP-667 Schedule 7 Farm Environment Plan Amendments	Consider that the inclusion of Waitaki specific Management Areas to Schedule 7 is necessary as these address matters identified as being of importance to the sub-region by the Zone Committee.	Oppose

Director General of Conservation	PC5LWRP-1682 Schedule 7 Farm Environment Plans	Agree that there needs to be specific consideration of adverse effects on threatened fish species and measures to protect these.	Support
Director General of Conservation	PC5LWRP-1678 Schedule 27	Agree that amendments be made to Schedule 27 to ensure Nitrogen Load Limits are not exceeded and account for all consents granted, lodged or potentially lodged including any permitted rules with additional nitrogen losses. This will provide certainty to the accounting of nitrogen losses and the ability to ensure water quality is maintained or improved.	Support
Forest and Bird NZ	PC5LWRP-1849 Planning Maps 7	Agree that the maps should be clear and locations easy to identify.	Support
FARM PORTAL			
Fonterra Co-Operative Group Ltd and Others	PC5LWRP-1851 Farm Portal	Agree that the proxies in Schedule 28 should produce reliable Good Management Practice loss rates.	Support