

From: [Lionel Hume](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 5 LWRP Further Submission
Date: Friday, 13 May 2016 4:17:06 p.m.
Attachments: [FNZ Further Submission LWRP PC5 2.pdf](#)

Dear Sir/Madam,

Attached is Federated Farmers' further submission on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan.

Yours sincerely

LIONEL HUME
SENIOR POLICY ADVISOR

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Federated Farmers of New Zealand

Further Submission on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan

13 May 2016



FURTHER SUBMISSION TO ENVIRONMENT CANTERBURY ON PROPOSED PLAN CHANGE 5 TO THE CANTERBURY LAND AND WATER REGIONAL PLAN

Form 6

Further submission in support of, or in opposition to, submission on publicly notified
proposed policy statement or plan

Clause 8 of First Schedule, Resource Management Act 1991

To: *Canterbury Regional Council
PO Box 345
Christchurch 8140*

Name of further submitter: Combined Canterbury Provinces, Federated Farmers of New Zealand

Contact person: Dr Lionel Hume
Senior Policy Advisor

Address for service: PO Box 414, Ashburton 7740 or lhume@fedfarm.org.nz

This is a further submission in response to submission/s made on the following: Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan – Part A (Region-wide Amendments) and Section 15B – Waitaki Sub-region.

The following pages detail the specifics in relation to our support or opposition to various submissions lodged. Our further submissions include the particular parts of each submission supported or opposed alongside our reasons for that position and what decision we seek from the local authority.

Federated Farmers wishes to be heard in support of its further submission.

Note to person making further submission

A copy of your further submission must be served on the original submitter within 5 working days after making the further submission to the local authority.

Where Federated Farmers submitted on the same variation point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers views on points raised by other submitters.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Central Plains Water Ltd	PC5LWRP-518	PC5	Support	On-farm good management practices should be tailored to the property. Consistent with Federated Farmers submission.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-724	PC5	Support in part	Support the review of good management practice to reflect new approaches, innovation and knowledge.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-723	Section 2 – How the Plan Works and Definitions	Oppose in part	The proposal does have some merit but it is not appropriate for a third party to determine requirements in a regional plan. In addition, it is not the role of an Accredited Farm Consultant to make cultural judgements, merely to ensure that FEPs are being implemented and give effect to the plan provisions.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-750	Section 2 – How the Plan Works and Definitions	Oppose in part	The proposal does have some merit but it is not appropriate for a third party to determine requirements in a regional plan. In addition, it is not the role of a Certified Farm Environment Plan Auditor to make cultural judgements, merely to ensure that FEPs are being implemented and give effect to the plan provisions.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-752	Section 2 – How the Plan Works and Definitions	Oppose	Good Management Practices (GMP's), as the phrase suggests, have a focus on practices rather than effects. The practices will have desirable effects, including for mahinga kai, wahi tapu, wahi taonga and the exercise of kaitiakitanga. However, GMP's must remain focused on practices in order to be effective. Therefore, the requested amendment is inappropriate.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-759	Section 2 – How the Plan Works and Definitions	Support	Allowance needs to be made for all farm development – not just dairy farming.
Hunter Downs Development Company Limited	PC5LWP-85	Definitions, translations and abbreviations	Support	Allowance needs to be made for farm development during the period prior to notification of this plan.
Hunter Downs Development Company Limited	PC5LWP-86	Definitions, translations and abbreviations	Support	Enables irrigation schemes to manage their N discharge within the terms of their resource consent.
Hunter Downs Development Company Limited	PC5LWP-88	Definitions, translations and abbreviations	Support	Clarifies meaning.
Barton N	PC5LWP-123	Definitions, translations and abbreviations	Support	Allowance needs to be made for farm development during the period prior to notification of this plan.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Dairy NZ	PC5LWP-212	Definitions, translations and abbreviations	Support	Allowance needs to be made for farm development during the period prior to notification of this plan.
Dairy NZ	PC5LWP-216	Definitions, translations and abbreviations	Support	Allowance needs to be made for farm development during the period prior to notification of this plan.
Dairy NZ	PC5LWP-217	Definitions, translations and abbreviations	Support	Allowance needs to be made for farm development during the period prior to notification of this plan.
Dairy NZ	PC5LWP-222	Definitions, translations and abbreviations	Support	Focuses on the situations most likely to result in increased N leaching.
Barrhill Chertsey Irrigation Scheme	PC5LWP-392	Definitions, translations and abbreviations	Support	Would lead to more effective/efficient management of nutrient discharge.
Barrhill Chertsey Irrigation Scheme	PC5LWP-393	Definitions, translations and abbreviations	Support	More accurate wording.
North Canterbury Fish and Game & SI Fish and Game	PC5LWP-690	Definitions, translations and abbreviations	Oppose	Doesn't improve the effectiveness of the definition.
Orari Water Users Group	PC5LWP-855	Definitions, translations and abbreviations	Support	Allowance needs to be made for farm development during the baseline period.
Forest and Bird NZ	PC5LWP-1781	Definitions, translations and abbreviations	Oppose	Unnecessarily prescriptive.
Forest and Bird NZ	PC5LWP-1783	Definitions, translations and abbreviations	Oppose	Confuses the roles of audit and compliance.
Forest and Bird NZ	PC5LWP-1786	Definitions, translations and abbreviations	Oppose	Not appropriate in a definition.
Forest and Bird NZ	PC5LWP-1794	Definitions, translations and abbreviations	Oppose	Doesn't focus on the situations that are most likely to result in increased N leaching.
Murchison JG and LM	PC5LWP-2038	Definitions, translations and abbreviations	Support	The threshold stocking rate is useful, as is the exclusion of containment under adverse events.
Irrigation New Zealand Inc & others	PC5LWP-2068	Definitions, translations and abbreviations	Support	Provides wording for an alternative pathway to the Farm Portal.
Barrhill Chertsey Irrigation Scheme	PC5LWP-392	4.11	Support in part	Our first choice is deletion but this submission provides a fall-back position in the event that Policy 4.11 is not deleted.
Horticulture NZ	PC5LWP-1586	4.34	Support	Improves accuracy.
Fonterra Co-operative Group & Others	PC5LWP-1864	4.36	Support	Provides wording for an alternative to the Farm Portal.
Fonterra Co-operative Group & Others	PC5LWP-716	4.37	Support in part	In the event that our original submission on this rule is not accepted, this submission provides wording for an alternative to the Farm Portal.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Fonterra Co-operative Group & Others	PC5LWP-725	4.38	Support in part	Federated Farmers continues to seek the decision requested in our original submission, but supports the parts of this submission which allow for an alternative to the Farm Portal.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-812	4.38	Oppose	This is not justified in an Orange Zone.
DairyNZ	PC5LWP-253	4.38AA	Support	Consistent with Federated Farmers' submission and specifies allowing an increase in N loss from farming activities, as a permitted activity, of no more than 5 kg/ha/year above the Baseline GMP Loss Rate or Loss Rate Assessed as Baseline GMP. As well as specifying a baseline for the increased N loss, it also provides wording for an alternative to the Farm Portal.
Fonterra Co-operative Group & Others	PC5LWP-728	4.38A	Support	Provides wording for an alternative to the Farm Portal. Also removes reference to Green or Light Blue Nutrient Allocation Zones. The policy should refer to Red, Orange and Lake Zones (as requested in Federated Farmers' submission).
Fonterra Co-operative Group & Others	PC5LWP-728	4.38A	Support	Provides wording for an alternative to the Farm Portal. As requested in our original submission, Lake Zones should be included in the list of Nutrient Allocation Zones to which the policy applies.
Forest and Bird NZ	PC5LWP-1804	4.38A	Oppose	Provision must be made for lawful activities.
Irrigation New Zealand Inc and others	PC5LWP-2105	4.38B	Support	Irrigation schemes and farming enterprises need to have the ability to manage nutrient losses as groups. This will lead to more efficient nutrient management and reduce the burden on the regulator.
Forest and Bird NZ	PC5LWP-1806	4.38C	Oppose	The submission to request immediate enforcement of the Baseline GMP Loss Rate is neither practical nor reasonable.
Barrhill Chertsey Irrigation Scheme	PC5LWP-671	4.38D	Support	Deadlines for compliance with GMP Loss Rate need to be extended and an alternative to the Farm Portal needs to be provided.
Forest and Bird NZ	PC5LWP-1807	4.38D	Oppose	The submission to request immediate enforcement of the GMP Loss Rate is neither practical nor reasonable.
North Canterbury Fish and Game & SI Fish and Game	PC5LWP-696	4.38E	Oppose	Federated Farmers is opposed to P Risk Zones except where there is potential for soil erosion and the loss of P along with sediment.
Ravensdown Limited & Others	PC5LWP-1760	4.41B	Support	An alternative pathway is needed in addition to the requirement not to exceed the Baseline GMP Loss Rate, along with the other mechanisms for managing inaccurate/aberrant Farm Portal results.
Forest and Bird NZ	PC5LWP-1813	4.41B	Oppose	Policy 4.41B (f) is about implementation of FEP's rather than the imposition of more stringent N loss reductions.
Irrigation New Zealand	PC5LWP-	4.41B	Support	Simplifies and clarifies the requirements of the policy.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Inc & others	2124			
Fonterra Co-operative Group & Others	PC5LWP-1160	Section 5 – Region-wide Rules	Support	Provides wording for an alternative to the Farm Portal.
Barrhill Chertsey Irrigation Scheme	PC5LWP-683	Section 5 – Region-wide Rules	Support	Provides for the establishment of Nutrient User Groups.
DairyNZ	PC5LWP-304	5.42A	Support	Consistent with FFNZ submission and provides specific wording.
North Canterbury Fish and Game & SI Fish and Game	PC5LWP-698	5.44A	Oppose	Reduces flexibility of land use for unspecified (probably minimal) environmental gain and it will be difficult (if not impossible) to determine the past area of winter grazing.
Fonterra Co-operative Group & Others	PC5LWP-732	5.45A	Support	Provides wording for an alternative to the Farm Portal.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-839	5.45A	Oppose	Required N loss rate reductions need to be determined as part of a collaborative, catchment-based limit-setting process.
Fonterra Co-operative Group & Others	PC5LWP-733	5.46A	Support	Provides wording for an alternative to the Farm Portal.
DairyNZ	PC5LWP-331	5.46A	Support	Restricted discretionary status is appropriate.
Fonterra Co-operative Group & Others	PC5LWP-737	5.50A	Support	Provides wording for an alternative to the Farm Portal.
Fonterra Co-operative Group & Others	PC5LWP-844	5.50A	Support	Provides wording for an alternative to the Farm Portal.
DairyNZ	PC5LWP-337	5.51A	Support	Includes matters covered under the proposed prohibited activity Rule 5.52A.
Hunter Downs Development Company Limited	PC5LWP-128	5.55A	Support	Consistent with our submission on Policy 4.41C, to allow an increase of 5 kg N/ha/year above Baseline GMP Loss Rate.
Fonterra Co-operative Group & Others	PC5LWP-741	5.55A	Support	Provides wording for an alternative to the Farm Portal.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-858	5.55A	Oppose	Required N loss rate reductions need to be determined as part of a collaborative, catchment-based limit-setting process.
Hunter Downs Development Company Limited	PC5LWP-130	5.56AA	Support	Consistent with our submission on Policy 4.41C, to allow an increase of 5 kg N/ha/year above Baseline GMP Loss Rate.
Fonterra Co-operative Group & Others	PC5LWP-742	5.56AA	Support	Provides wording for an alternative to the Farm Portal. In addition, there needs the ability for N discharge to exceed the Baseline GMP Loss Rate, consistent with our submission on Policy 4.41C and with our further submissions above.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Ravensdown Limited & Others	PC5LWP-2009	5.56AA	Support	An alternative pathway to the Farm Portal is needed along with the other mechanisms for managing inaccurate/aberrant Farm Portal results. Embedding the GMP Loss Rate in the FEP process is a more appropriate approach than using it as a consent condition.
DairyNZ	PC5LWP-343	5.56AA	Support	Non-complying activity status only appropriate if submissions on previous related rules accepted.
Forest and Bird NZ	PC5LWP-1838	5.56AA	Oppose	Inappropriate for an Orange Zone, and for any zone given issues with the Farm Portal.
Ravensdown Limited & Others	PC5LWP-2022	5.57C	Support	An alternative pathway to the Farm Portal is needed along with other mechanisms for managing inaccurate/aberrant Farm Portal results. Embedding the GMP Loss Rate in the FEP process is a more appropriate approach than using it as a consent condition.
Hunter Downs Development Company Limited	PC5LWP-134	5.58A	Support	Consistent with our submission on Rule 5.58A. Support the amended conditions.
Fonterra Co-operative Group & Others	PC5LWP-743	5.58A	Support	Provides wording for an alternative to the Farm Portal.
Ravensdown Limited & Others	PC5LWP-2025	5.58A	Support	An alternative pathway to the Farm Portal is needed along with other mechanisms for managing inaccurate/aberrant Farm Portal results. Embedding the GMP Loss Rate in the FEP process is a more appropriate approach than using it as a consent condition.
Hunter Downs Development Company Limited	PC5LWP-135	5.58B	Support in part	Support the proviso that intensification can only go up to a GMP Loss Rate.
Hunter Downs Development Company Limited	PC5LWP-141	Schedule 28 Good Management practice Modelling Rules	Support	Support the additional explanation statement regarding the alternative consenting pathway.
Murchison JG and LM	PC5LWP-2047	Planning Maps - 7	Support	Opposed to the way in which High Risk Runoff and Phosphorus Zones have been identified.
DairyNZ	PC5LWP-397	15B.1 Waitaki Sub-region Definitions	Support	Requested wording provides wording for and alternative policy pathway to the Farm Portal.
Ravensdown Limited & Others	PC5LWP-2066	15B.1 Waitaki Sub-region Definitions	Support	Provides wording for reassessment of headroom when Farm Portal amended.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-877	Waitaki Sub-region Policies	Oppose in part	Required N loss rate reductions need to be determined as part of a collaborative, catchment-based limit-setting process.
DairyNZ	PC5LWP-398	15B.4.2	Support	Improved wording.
DairyNZ	PC5LWP-	15B.4.4	Support	Improved wording.

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
	399			
DairyNZ	PC5LWP-403	15B.4.13	Support	Provides wording for an alternative to the Farm Portal.
North Canterbury Fish and Game & SI Fish and Game	PC5LWP-748	15B.4.13	Oppose	Impossible to determine this in absolute terms at the time of a consent application. Water quality objectives have been built into the proposed plan.
Fonterra Co-operative Group & Others	PC5LWP-1167	15B.4.14	Support	Provides for an alternative to the Farm Portal.
Fonterra Co-operative Group & Others	PC5LWP-1171	15B.4.15	Support	Provides wording for an alternative to the Farm Portal.
Fonterra Co-operative Group & Others	PC5LWP-1206	15B.4.20	Support	Provides wording for an alternative to the Farm Portal. This would apply in addition to the 10 kg N/ha/year requested in our original submission i.e. for discharges over 10 kg N/ha/year if our submission is accepted.
Central South Island Fish and Game Council	PC5LWP-754	15B.4.20	Oppose	Overrides position reached via a community consultation process.
DairyNZ	PC5LWP-409	15B.4.22	Support in part	Provides a little additional land use flexibility. Support in the event that our original submission is not accepted.
The Wolds Station Ltd	PC5LWP-432	15B.4.23	Support	The requirements of Policy 15B.4.23 are unreasonable and potentially extremely onerous.
Fonterra Co-operative Group & Others	PC5LWP-2044	15B.4.24	Support in part	Support with regard to provision of an alternative to the Farm Portal. Otherwise our original submission applies.
DairyNZ	PC5LWP-412	15B.4.25	Support	Support with regard to provision of an alternative to the Farm Portal, in addition to our original submission.
Director General of Conservation	PC5LWP-1608	15B.4.25	Oppose	It is difficult to see how this could be achieved other than via water quality, which has already been addressed by the policy.
DairyNZ	PC5LWP-414	15B.4.26	Support in part	Provides wording for an alternative to the Farm Portal.
DairyNZ	PC5LWP-416	15B.4.26	Support	Provides wording for an alternative to the Farm Portal.
DairyNZ	PC5LWP-450	15B.5.7	Support in part	Provides wording for an alternative to the Farm Portal.
Waitaki Irrigators Collective and Others	PC5LWP-783	15B.5.9	Support	Prohibited activity status is not appropriate for a matter which does not represent a threat to the environment.
DairyNZ	PC5LWP-451	15B.5.10	Support in part	Provides wording for an alternative to the Farm Portal.
Central South Island Fish	PC5LWP-	15B.5.10	Oppose	Water quality outcomes have already been taken into account during a

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
and Game Council	720			collaborative limit-setting process.
DairyNZ	PC5LWP-452	15B.5.11	Support	Prohibited activity status is not appropriate, particularly because one of the conditions relies on outputs from the Farm Portal.
Twinburn Ltd	PC5LWP-1107	15B.5.13A	Support	The points listed need to be clarified/provided for.
Ravensdown Limited & Others	PC5LWP-2169	15B.5.13B	Support	Restricted discretionary is an appropriate activity status because of the clear list of matters to consider.
Beef and Lamb New Zealand Ltd & Others	PC5LWP-1525	15B.5.14	Support	Provides additional flexibility of land use.
DairyNZ	PC5LWP-454	15B.5.15	Support in part	Provides wording for an alternative to the Farm Portal.
DairyNZ	PC5LWP-462	15B.5.16	Support in part	Provides wording for an alternative to the Farm Portal (in the event that the rule is not deleted, as requested in our original submission).
DairyNZ	PC5LWP-301	15B.5.17	Support	Consistent with our original submission request to apply non-complying activity status to Rule 15B.5.18.
DairyNZ	PC5LWP-497	15B.5.18	Support	Consistent with our original submission request to apply non-complying activity status to Rule 15B.5.18 and our further submission to consolidate all matters with non-complying status into Rule 15B.5.17.
Director General of Conservation	PC5LWP-2749	15B.5.18B	Oppose	Consistent with request to delete Condition 3.
Ravensdown Limited & Others	PC5LWP-2189	15B.5.18C	Support	Restricted discretionary is an appropriate activity status because of the clear list of matters to consider.
DairyNZ	PC5LWP-498	15B.5.19	Support	Consistent with our submission. Provides wording for an alternative to the Farm Portal.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-929	15B.5.19	Oppose	Any required N loss rate reductions need to be determined as part of a collaborative, catchment-based limit-setting process.
Director General of Conservation	PC5LWP-2742	15B.5.19	Oppose	Controlled activity status is appropriate for an activity that has rigorous constraints on nutrient discharge. The requested matters for control are matters which should be developed as part of a collaborative, catchment-based limit-setting process.
DairyNZ	PC5LWP-499	15B.5.20	Support	Consistent with our submission. Provides wording for an alternative to the Farm Portal. Requests deletion of matter for discretion 11.
Central South Island Fish and Game Council	PC5LWP-760	15B.5.20	Oppose	Too simplistic. The calculation methodology is clearly stated in Schedule 27.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-932	15B.5.20	Support	Improves clarity.
Fonterra Co-operative	PC5LWP-	15B.5.20	Support in part	Support with regard to provision of wording for an alternative to the

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Group & Others	2069			Farm Portal. Otherwise our original submission applies.
Director General of Conservation	PC5LWP-2750	15B.5.20	Oppose	Restricted activity status is appropriate for an activity that has rigorous constraints on nutrient discharge. The requested matters for control are matters which should be developed as part of a collaborative, catchment-based limit-setting process.
Central South Island Fish and Game Council	PC5LWP-762	15B.5.21	Oppose	Too simplistic. The calculation methodology is clearly stated in Schedule 27.
DairyNZ	PC5LWP-501	15B.5.22	Support in part	In the event that our request for discretionary activity status is not accepted, consolidate Rule15B.5.23 matters into Rule 15B.5.22.
DairyNZ	PC5LWP-502	15B.5.23	Support in part	In the event that our request for discretionary activity status for Rule 15B.5.22 is not accepted, and consistent with our original submission request to apply non-complying activity status to Rule15B.5.23, consolidate all matters with non-complying status into Rule 15B.5.22.
Fertiliser Association of New Zealand	PC5LWP-1670	15B.5.24	Support	Should reduce cost without adverse environmental impact.
DairyNZ	PC5LWP-504	15B.5.25	Support in part	Provides wording for an alternative to the Farm Portal.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-938	15B.5.25	Oppose	Any required N loss rate reductions need to be determined as part of a collaborative, catchment-based limit-setting process.
Director General of Conservation	PC5LWP-2743	15B.5.25	Oppose	Controlled activity status is appropriate for an activity that has rigorous constraints on nutrient discharge. The requested matters for control are matters which should be developed as part of a collaborative, catchment-based limit-setting process.
DairyNZ	PC5LWP-505	15B.5.26	Support	Consistent with our submission. Provides wording for an alternative to the Farm Portal.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-939	15B.5.26	Oppose	Any required N loss rate reductions need to be determined as part of a collaborative, catchment-based limit-setting process.
Forest and Bird NZ	PC5LWP-1936	15B.5.26	Oppose	The requested amendment has the potential to be unduly onerous and costly.
Director General of Conservation	PC5LWP-2752	15B.5.26	Oppose	Controlled activity status is appropriate for an activity that has rigorous constraints on nutrient discharge. The requested matters for control are matters which should be developed as part of a collaborative, catchment-based limit-setting process.
DairyNZ	PC5LWP-506	15B.5.27	Support	Consistent with our submission. Provides wording for an alternative to the Farm Portal.
DairyNZ	PC5LWP-507	15B.5.28	Support	Consistent with our original submission request to apply non-complying activity status to Rule15B.5.29.
DairyNZ	PC5LWP-	15B.5.29	Support	Consistent with our original submission request to apply non-complying

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
	508			activity status to Rule15B.5.29 and our further submission to consolidate all matters with non-complying status into Rule 15B.5.28.
DairyNZ	PC5LWP-92	15B.5.30	Support	Consistent with our submission. Provides wording for an alternative to the Farm Portal.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-940	15B.5.30	Oppose	Any required N loss rate reductions need to be determined as part of a collaborative, catchment-based limit-setting process.
DairyNZ	PC5LWP-77	15B.5.31	Support in part	Consistent with our submission. Provides wording for an alternative to the Farm Portal.
Forest and Bird NZ	PC5LWP-1942	15B.5.31	Oppose	The requested amendment has the potential to be unduly onerous and costly.
Director General of Conservation	PC5LWP-2752	15B.5.31	Oppose	Controlled activity status is appropriate for an activity that has rigorous constraints on nutrient discharge. The requested matters for control are matters which should be developed as part of a collaborative, catchment-based limit-setting process.
DairyNZ	PC5LWP-598	15B.5.32	Support	Consistent with our original submission request to apply non-complying activity status to Rule15B.5.33.
DairyNZ	PC5LWP-599	15B.5.33	Support	Consistent with our original submission request to apply non-complying activity status to Rule15B.5.33 and our further submission to consolidate all matters with non-complying status into Rule 15B.5.32.
DairyNZ	PC5LWP-602	15B.5.34	Support in part	Consistent with our submission. Provides wording for an alternative to the Farm Portal.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-989	15B.5.34	Oppose	Any required N loss rate reductions need to be determined as part of a collaborative, catchment-based limit-setting process.
Director General of Conservation	PC5LWP-2745	15B.5.34	Oppose	Controlled activity status is appropriate for an activity that has rigorous constraints on nutrient discharge. The requested matters for control are matters which should be developed as part of a collaborative, catchment-based limit-setting process.
DairyNZ	PC5LWP-603	15B.5.35	Support in part	Consistent with our submission. Provides wording for an alternative to the Farm Portal.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-994	15B.5.35	Oppose	Any required N loss rate reductions need to be determined as part of a collaborative, catchment-based limit-setting process.
Forest and Bird NZ	PC5LWP-1947	15B.5.35	Oppose	The requested amendment has the potential to be unduly onerous and costly.
Director General of Conservation	PC5LWP-2753	15B.5.35	Oppose	Controlled activity status is appropriate for an activity that has rigorous constraints on nutrient discharge. The requested matters for control are matters which should be developed as part of a collaborative, catchment-based limit-setting process.
DairyNZ	PC5LWP-	15B.5.37	Support	Consistent with our original submission request to apply non-complying

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
	620			activity status to Rule15B.5.38.
DairyNZ	PC5LWP-621	15B.5.38	Support	Consistent with our original submission request to apply non-complying activity status to Rule15B.5.38 and our further submission to consolidate all matters with non-complying status into Rule 15B.5.37.
DairyNZ	PC5LWP-624	15B.5.39	Support	Consistent with our submission. Provides wording for an alternative to the Farm Portal.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-996	15B.5.39	Oppose	Any required N loss rate reductions need to be determined as part of a collaborative, catchment-based limit-setting process.
Director General of Conservation	PC5LWP-2746	15B.5.39	Oppose	Controlled activity status is appropriate for an activity that has rigorous constraints on nutrient discharge. The requested matters for control are matters which should be developed as part of a collaborative, catchment-based limit-setting process.
DairyNZ	PC5LWP-635	15B.5.40	Support in part	Consistent with our submission. Provides wording for an alternative to the Farm Portal.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-1000	15B.5.40	Oppose	Any required N loss rate reductions need to be determined as part of a collaborative, catchment-based limit-setting process.
Forest and Bird NZ	PC5LWP-1951	15B.5.40	Oppose	The requested amendment has the potential to be unduly onerous and costly.
Director General of Conservation	PC5LWP-2754	15B.5.40	Oppose	Controlled activity status is appropriate for an activity that has rigorous constraints on nutrient discharge. The requested matters for control are matters which should be developed as part of a collaborative, catchment-based limit-setting process.
DairyNZ	PC5LWP-655	15B.5.42	Support	Consistent with our original submission request to apply non-complying activity status to Rule15B.5.43.
DairyNZ	PC5LWP-657	15B.5.43	Support	Consistent with our original submission request to apply non-complying activity status to Rule15B.5.43 and our further submission to consolidate all matters with non-complying status into Rule 15B.5.42.
DairyNZ	PC5LWP-659	15B.5.44	Support	Consistent with our submission. Provides wording for an alternative to the Farm Portal.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-1002	15B.5.44	Oppose	Any required N loss rate reductions need to be determined as part of a collaborative, catchment-based limit-setting process.
Director General of Conservation	PC5LWP-2747	15B.5.44	Oppose	Controlled activity status is appropriate for an activity that has rigorous constraints on nutrient discharge. The requested matters for control are matters which should be developed as part of a collaborative, catchment-based limit-setting process.
DairyNZ	PC5LWP-665	15B.5.45	Support in part	Provides wording for an alternative to the Farm Portal.
Nga Runanga and Te	PC5LWP-	15B.5.45	Oppose	Any required N loss rate reductions need to be determined as part of a

Submitter Name	Sub No.	Section of Plan	Support/ Oppose	Reason for submission
Runanga O Ngai Tahu	1005			collaborative, catchment-based limit-setting process.
Forest and Bird NZ	PC5LWP-1956	15B.5.45	Oppose	The requested amendment has the potential to be unduly onerous and costly.
Director General of Conservation	PC5LWP-2755	15B.5.45	Oppose	Controlled activity status is appropriate for an activity that has rigorous constraints on nutrient discharge. The requested matters for control are matters which should be developed as part of a collaborative, catchment-based limit-setting process.
DairyNZ	PC5LWP-1088	15B.5.47	Support	Consistent with our original submission request to apply non-complying activity status to Rule 15B.5.48.
DairyNZ	PC5LWP-1094	15B.5.48	Support	Consistent with our original submission request to apply non-complying activity status to Rule 15B.5.48 and our further submission to consolidate all matters with non-complying status into Rule 15B.5.47.
Central South Island Fish and Game Council	PC5LWP-766	15B(a) – Freshwater Outcomes for Waitaki Rivers to be achieved by 2030	Oppose	Dissolved oxygen and temperature are subject to large short-term fluctuations which are unlikely to have long-term effects and are unable to be controlled by farmers.
Central South Island Fish and Game Council	PC5LWP-770	15B(c) – Water Quality Limits for Waitaki Rivers	Oppose	No scientific justification.
Central South Island Fish and Game Council	PC5LWP-771	15B(d) – Water Quality Limits for Lakes in the Upper Waitaki Freshwater Management Unit	Oppose	Numbers need more scrutiny. For example, no scientific or community-derived reason for TLI of Lake Ruataniwha to be set at 1.7.
Director General of Conservation	PC5LWP-1671	15B(d) – Water Quality Limits for Lakes in the Upper Waitaki Freshwater Management Unit	Oppose	No scientific or community-derived reason for some values e.g. TLI of 1.7 for Lake Ruataniwha.
DairyNZ	PC5LWP-667	Schedule 7 Farm Environment Plan Amendments	Support	The matters covered are built into both district and regional plans.
Nga Runanga and Te Runanga O Ngai Tahu	PC5LWP-1006	Schedule 7 Farm Environment Plan Amendments	Oppose	The matters covered in the notified amendment are built into both district and regional plans. The additional amendment contains unnecessary prescription.
DairyNZ	PC5LWP-669	Schedule 27 On-land Nitrogen Load Conversion	Support	Peer review and scenario testing are crucial.

Conclusion

Federated Farmers thanks Environment Canterbury for the opportunity to further-submit on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan. We look forward to ongoing dialogue about the plan and continuing to work constructively with Council.

A handwritten signature in blue ink, appearing to read 'Willy Leferink', is centered on a light green rectangular background.

Willy Leferink
Chair, Canterbury Regional Policy Committee
Mid Canterbury Provincial President
Federated Farmers of New Zealand