

**From:** [Scott Pearson](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** PC5 Further SUBmission Fish and Game  
**Date:** Friday, 13 May 2016 4:57:43 p.m.  
**Attachments:** [Fish and Game Further submission LWRP Plan Change 5.pdf](#)

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Please find attached.

Regards Scott

**Scott Pearson** | Environmental Advisor

**North Canterbury Fish & Game Council**

PO Box 50, Woodend 7641, North Canterbury

**M** +64 027 525 2650 | **E** [northcanterbury@fishandgame.org.nz](mailto:northcanterbury@fishandgame.org.nz) | **W** [www.fishandgame.org.nz](http://www.fishandgame.org.nz)



**RESOURCE MANAGEMENT ACT 1991**

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

To: Environment Canterbury

From: North Canterbury Fish & Game and Central South Island Fish & Game

**Address for service:**

**North Canterbury Fish & Game**

PO Box 50

Woodend 7641

Attn: Scott Pearson

Email: [spearson@fishandgame.org.nz](mailto:spearson@fishandgame.org.nz)

**Central South Island Fish & Game**

PO Box 150

Temuka 7948

Attn: Angela Christensen

Email: [achristensen@csifgc.org.nz](mailto:achristensen@csifgc.org.nz)

1. This further submission is filed by North Canterbury Fish & Game and Central South Island Fish & Game in response to submissions made in respect of proposed Plan Change 4 to the Canterbury Land and Water Regional Plan. The further submissions are outlined in Annexure 1.
2. Fish & Game wishes to be heard in support of this submission, and would be prepared to consider presenting this submission in a joint case with others making a similar submission at any hearing.

**Annexure 1**

	<b>Submitter</b>	<b>Point ID</b>	<b>Reasons</b>	<b>Support/oppose</b>
Plan Change 5 to the Canterbury Land and Water Regional Plan	Central Plains Water Ltd	PC5LWRP-518	<p>Fish and Game does not support a separate consenting pathway that bypasses the farm portal. It is important that ECan has access to the collective pool of information the portal can provide, in order to more effectively manage catchment nutrient allocation mechanisms, covering both individual farms and irrigation schemes. This tool will help all farmers and collective irrigation schemes to assist identifying and managing their required GMP loss rate.</p> <p>The submitter seeks an alternative consenting pathway that does not rely on the outputs of the Farm Portal [see original submission for detail, see also PC5LWRP-516 (Farm Portal)].</p>	Oppose
	Canterbury District Health Board	PC5LWRP-1351	<p>Fish and Game support a staged approach with sufficient monitoring to ensure stream nutrient levels remain within those set by the plan, and that 90% is the minimum [protection level] achieved. This will reduce the risk of environmental damage should GMP/MGM implementation not achieve its projected outcomes in the short to medium term.</p> <p>AND</p> <p>include a specific statement around the protection of community water supplies. Support as it is critical for community health and an important indicator of environmental and ecosystem health.</p>	Support

	Submitter	Point ID	Reasons	Support/oppose
			<p>AND</p> <p>replace [the word] 'avoiding' with stronger terminology, e.g 'preventing' across all policies. <b>Adds more weight to provisions.</b></p>	
	Mackenzie Irrigation Company Ltd	PC5LWRP-1363	<p><b>Fish and Game oppose the request to:</b></p> <p>Amend PC5 to ensure GMP is about actual on-farm practice rather than the plan linking GMP to an Overseer output number, and ensure GMP practices are better defined in the plan so that the expectations of farmers are clear.</p> <p><b>on the basis that both on-farm practices and Overseer output numbers are important for achieving long term plan limits and providing the information necessary for managing Zone Nutrient Allocation.</b></p>	Oppose
	Fonterra Co-operative Group Ltd & Others	PC5LWRP-2050	<p><b>Fish and Game considers GMP loss rates are an important and necessary component for implementing the objectives, policies and rules of the plan and in meeting higher order RMA documents.</b></p> <p>Amend PC5 policies, rules and associated definitions to remove the reliance on the Good Management Practice Loss Rates.</p>	Oppose

	Submitter	Point ID	Reasons	Support/oppose
	Federated Farmers of New Zealand & Others	PC5LWRP-2761	<p>Fish and Game consider FEPs are still relatively untested in terms of delivering desired outcomes and therefore GMP loss rates should play a key role in consent decisions directly, in order to achieve the objectives, policies and rules of the plan and in meeting higher order RMA documents.</p> <p>Amend to incorporate GMP Loss Rate within the FEP process rather than using it as the basis for granting consent.</p>	Oppose
	DairyNZ and all other submitters who have requested this change.	PC5LWRP-213	<p>Fish and Game want to retain the use of the “average” nitrogen loss rate below the root zone, because a change to the highest annual nitrogen loss rate would encourage or allow increased discharges up to the maximum, rather than account for unders and overs during the four year period; in order to achieve the objectives, policies and rules of the plan and in meeting higher order RMA documents.</p> <p>Amend definition of 'Good Management Practice Loss Rate' as follows: means the highest annual <del>average</del> nitrogen loss rate below the root zone, as estimated by the Farm Portal, for the farming activity carried out over the most recent four year period, if operated at good management practice.</p> <p>Or words to similar effect.</p>	Oppose

	Submitter	Point ID	Reasons	Support/oppose
	DairyNZ	PC5LWRP-216	Apply the same principle as the row above that retention of the “average” is more appropriate than the “highest annual nitrogen loss in this context.	Oppose
<b>Policies</b>	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	PC5LWRP-764	<p>Fish and Game support this linking policy between GMP and zone nutrient allocation mechanisms for achieving plan limits.</p> <p>Insert new Policy under 'Nutrient Management' as follows:</p> <p>Freshwater quality is maintained or improved within catchment management zones by enabling the ability to establish provisions for Good Management Practice Loss Rates that in turn enable the management of freshwater to meet a specific water quality limit or limits. Measures may include staged reduction of nutrient losses, maximum nutrient loss rates and permitted levels of nutrient loss.</p> <p>AND</p> <p>Ensure that the provisions in Part A do not limit the ability for any future plan change for Zones to introduce caps or permitted activity baselines.</p>	Support
4.34	Horticulture New Zealand	PC5LWRP-1586	<p>Fish and Game supports this amendment to achieve a consistent definition of good management practice.</p> <p>Amend Policy 4.34 b) by changing ‘good practice’ to ‘good management practice’.</p>	Support

	Submitter	Point ID	Reasons	Support/oppose
4.36	Dairy Holdings Limited	PC5LWRP-174	<p>Fish and Game supports this amendment to achieve a consistent definition of good management practice.</p> <p>Amend Policy 4.36(a) to refer to "....good management practices".</p>	Support
5.44A	Beef and Lamb New Zealand Ltd & Others	PC5LWRP-1370	<p>Fish and Game wants to retain rule 5.44A, subject to our own requested relief, but it does not support deleting the rule, or amending the rule as suggested below to a 10% of the property threshold or allowing 50 hectares or 10% of the property to be in winter grazing. These proposed changes could lead to significant increases in nutrient discharge and not be in keeping with the objectives, policies and rules of the plan and in meeting higher order RMA documents.</p> <p>Delete Rule 5.44A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits. In the event that this approach is not adopted:</p> <p>Amend Rule 5.44A as follows:</p> <p>2. The area of the property authorised to be irrigated with water is less than 50 hectares and 10 percent of the property; ....</p> <p>4. The area of any property used for winter grazing within the period 1 May to 1 September does not exceed a total of 2050 hectares and 10% of the property ; and...</p>	Oppose

	Submitter	Point ID	Reasons	Support/oppose
5.54A	Beef and Lamb New Zealand Ltd & Others	PC5LWRP-1398	<p>Fish and Game wants to retain rule 5.54A, subject to our own requested relief, but it does not support deleting the rule, or amending the rule as suggested below to a 10% of the property threshold or allowing 50 hectares or 10% of the property to be in winter grazing. These proposed changes could lead to significant increases in nutrient discharge and not be in keeping with the objectives, policies and rules of the plan and in meeting higher order RMA documents.</p> <p>Delete Rule 5.54A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.</p> <p>OR</p> <p>Amend Rule 5.54A as follows:</p> <p>2. The area of the property authorised to be irrigated with water is less than 50 hectares and 10 percent of the property ; and</p> <p>3. The area of any property used for winter grazing within the period 1 May to 1 September does not exceed a total of 2050 hectares and 10% of the property ; and...</p>	Oppose
5.50A	Nga Rūnanga and Te Rūnanga O Ngāi Tahu	PC5LWRP-844	<p>Fish and Game support this amendment on the basis that it consistent with achieving Policy 4.37(b).</p> <p>Amend Rule 5.50A to include an additional matter of discretion as follows: The nitrogen loss rate reductions applicable to the property to fulfil Policy 4.37(b);</p>	Support



	Submitter	Point ID	Reasons	Support/oppose
5.50A	Canterbury District Health	PC5LWRP-1262	<p><b>Fish and Game support these amendments in order to meet the objectives, policies and rules of the plan and in meeting higher order RMA documents.</b></p> <p>Amend Rule 5.50A as follows:</p> <p>1) Matters of Discretion (3) to read: "The actual or potential adverse effects of the activity on surface and groundwater quality and sources of drinking water and how these will be avoided and mitigated ;.."</p> <p>AND</p> <p>2) Insert a [new] section to explain at what level mitigation measures should be implemented.</p>	Support
5.51A and 5.52A	Beef and Lamb New Zealand Ltd & Others	PC5LWRP-1392 And PC5LWRP-1832	<p><b>Fish and Game oppose this deletion and alternative relief given the sensitivity of the lake zone environment and the need for certainty in the approach taken.</b></p> <p>Delete Rule 5.51A and 5.52A and replace with the development of a collaborative approach and a natural capital approach to the allocation of nitrogen discharge limits.</p>	Oppose