

Further questions for the S42A Report authors

Under the S42A recommendations farms in the Greater Waikakahi Zone and Hakataramea River Zone may have to reduce N loss for the portion of the property used for winter grazing or irrigation to 90% of GMP Loss Rate (Rule 15B.5.25 matter of control 5) to provide headroom for the permitted activities provided for under new recommended Rule xx.xx.xx. As that is now only a “may”, will there be sufficient headroom for farms that would be permitted under Rule xx.xx.xx?

If the Farm Portal calculates an N fertiliser application rate at GMP (kg/ha/year) is the farmer obliged to not exceed that fertiliser application rate or do they instead have to comply with the overall *Baseline GMP Loss Rate* or *GMP Loss Rate* by whatever means they chose?

On page 5-9 of Appendix 1 to the S42A Report should the recommended amendment to Rule 5.54A Condition 2 have been made instead to Condition 3?

Using Rule 15B.5.25 as an example (this question is relevant to a number of rules), with the recommended deletion of Condition 2(b), what happens after 30 June 2020?

Rule 15B.5.7:

- a. Is the “plan” in Condition 1(b) the FEP referred to in matter of control (1)?
- b. Are “Overseer budgets” (matter of control (2)) required by the conditions of the rule?
- c. Do the “reductions beyond Good Management Practice” (matter of control (4)) relate only to the matters under Condition 2(b)?
- d. What is the purpose of matter of control (8) when Rule 15B.5.7 is a controlled activity and applications under it must be granted?
- e. How would having regard to Policy 15B.4.14 aid a decision-maker given the existing requirement under Rule 15B.5.7 Condition 2(b)?

Should all of the rules in Section 15B (except for prohibited activity rules) have conditions requiring the property to be registered in the Farm Portal? For example, under the heading “Greater Waikakahi Zone and Hakataramea Freshwater Management Unit” (as recommend to be amended), Rule 15B.5.24 requires registration, but Rules 15B.5.25 to 15B.5.28 do not. Or is that requirement thought to be covered implicitly by the wording of Schedule 7 Part B, 4B(b)?

Why was the recommended amendment to Policy 15B.4.24(b) [S42A Errata] not recommended for Policy 15B.4.26(b)?

Has the recommended amendment to Policy 15B.4.24(b) been reflected in consequential recommended amendments to the rules?

Could Policies 15B.4.24 and 15B.4.26 be combined as a consequence of the recommended merging of the rules for those areas?

Could Policies 15B.4.25 and 15B.4.27 be combined as a consequence of the recommended merging of the rules for those areas?

How do Rules 15B.5.6(a) and (b) interact with Rules 15B.5.13A(2) and (3) and 15B.5.18A(2) and (3)?

Policy 15B.4.22(b). With regard to the point raised by Chris Hansen (Ravensdown) at his para 147 what was the intent of clause (b)?

From the evidence of Reuben Edkins for RDRML (his Appendix 2) it appears that PC5 has amended Schedule 7 to align with the objectives and targets in the *Canterbury Certified Farm Environment Plan (FEP) Auditor Manual (February 2016)*. Is that correct?