

## Summary of feedback on draft Plan Change 1 to the Hurunui and Waiau River Regional Plan and Section 32 report

### General feedback

Stakeholder	Feedback summary	Staff recommendation
Rural Advocacy Network	Support intent of PC1	
Rural Advocacy Network	The Plan Change is <i>ultra vires</i> because it was not developed as a part of a process described in the NPS-FM for the identification of values and attributes and outcomes within Freshwater Management Units, and the setting of limits.	The HWRRP was developed in the process described by the submitter, in the process that was relevant at the time (described by the NPS-FM 2011). The Plan Change does not seek to change the outcomes, values or attributes of the relevant catchments, not does it seek to change the limits set within those catchments. PC1 sets out an alternative suite of methods for the achievement of the Objectives and Policies of the HWRRP.
Rural Advocacy Network	PC1 is predicated on flawed load limits	The load limits are not at issue and are beyond the scope of the Plan Change
Federated Farmers	Seek provision for a permitted amount of irrigation, consistent with red zone rules in Plan Change 5 to the LWRP. If increased N load is a concern, the provision could be limited to irrigation that was lawfully established prior to 2012	N load is a concern and it is unlikely water quality could be maintained if PC1 were to provide for additional irrigated land use as a permitted activity. Draft PC1 does not alter the permitted activity status for land use, including irrigated land use, established at the time the plan became operative. Existing irrigated land use can continue as a permitted activity where it complies with rules 10.1 and 10.2
Amuri Irrigation Company	The s32 report should acknowledge AIC's commitment to work with all parties to develop a solution	Ensure the s32 report acknowledges the collaborative approach to identifying the solution
Amuri Irrigation Company	AIC question if it can be considered that there is a "permitted" N load for the Hurunui River because many existing land uses have not complied with the date limited permitted activity conditions. For this reason AIC consider the offset needed is 38t, rather than 8t	On the basis of further discussion with irrigators, amend the s32 report to identify acknowledge a potential over-allocation and that a 38t offset will be needed in order to improve water quality
Amuri Irrigation Company	the plan change documentation does not address effects on water quality down stream of SH1 in the Hurunui river – this should be addressed	Acknowledge this in the s32 report and note that limits are set on the Hurunui at Mandamus and SH1 to achieve the objectives of the Plan in the entire Hurunui catchment (ki uta ki tai). Maintaining water quality within the limits at Mandamus and SH1 will

		ensure outcomes are achieved for the entire catchment.
Amuri Irrigation Company	To better enable nitrogen load offset by way of tributary pumping, amend the notes following both aspects of Table 1 in Part 4 of the HWRRP to make it clear that only the minimum flows in the drains apply to takes that form part of a "nutrient management system"	It is noted that the Plan (and in particular, Policy 2.10) currently enables the use of tributary pumping for nutrient management. The amendments sought are beyond the scope of the plan change
Beef+Lamb New Zealand	Include a new policy to address the different attenuation rates for dryland and irrigated land as follows: <u>Recognition will be given to the different capacity of the land to attenuate nutrients based on soil type, topography, proximity to freshwater bodies, and land use.</u>	Attenuation has been a consideration in relevant consent decisions. For example, the land use consent granted to Ngai Tahu Farming for the Balmoral property identified the smaller attenuation factor for the light soils in Balmoral. Attenuation rates for land use type has also been a consideration in the calculation of load estimates from dryland during the development of PC1, and are a consideration in catchment load accounting methods. A policy recognising the different attenuation rates is unnecessary and out of scope for this plan change.
Beef+Lamb New Zealand	There should be reliable data giving indication of dryland in-stream losses into the future. Insert a new method into the Plan as follows: <u>Water-borne contaminants and water flow from catchments, including those dominated by dryland or non-productive land use, are permanently monitored using nutrient gauges and flow gauges.</u>	The CRC already has a monitoring network in place. Catchment accounting requirements will inform future estimates of dryland contribution to in-river loads. The change requested is outside the scope of the plan change, but additional monitoring could be considered in Environment Canterbury's monitoring work programme to inform a plan review in 2022.
North Canterbury Fish and Game	Fish and Game has serious concerns with the Zone Committee's primary mandate to alleviate the effects of HWRRP Rule 10.1 on land users, by transferring most of that burden back to the environment. We believe the offset agreement is not legal or appropriate, leading to an overall 28%+ increase in N allocation within the catchment since the Zone Committee's inception, and an understated assessment of dryland's potential phosphorus contribution, through more intensive activities. Fish and Game will oppose Plan Change 1 and the justifications for its adoption, in its current form.	
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	to the environment. We believe the offset agreement is not legal or appropriate, leading to an overall 28%+ increase in N allocation within the catchment since the Zone Committee's inception, and an understated assessment of dryland's potential phosphorus contribution, through more intensive activities.	
North Canterbury Fish and Game	Fish and Game also has concerns about some heavy policy and scientific bias displayed in the S32 report in support of the current plan change and the minimal allocation adjustments it prescribes.	
North Canterbury Fish and Game	Fish and Game strongly disagrees with the way the nutrient accounting approach has been used by Canterbury Regional Council (ECan), in modelling an additional 38t/N/year source load, greater than the existing activity provisions (page 13, PC1 S32 Report). The Hurunui Science Stakeholder Group meetings and the nutrient allocation workshops that Fish and Game attended (before withdrawing our involvement), indicated a higher worst-case scenario from dryland farming of 70 t/N/year source load based on a higher-level desktop/catchment risk analysis. Yet no mention of this assessment is made in the S32 report in comparison to the more directly modelled accounting method which has been used – despite several stakeholders favouring the former approach.	Documents supporting the s32 report set out the reasoning for choosing the specific methodology for calculating the off-set load requirement. The methodology used is the same as was used in relevant consents - it is matter of comparing "apples with apples"
North Canterbury Fish and Game	It should be noted that the risk scenarios above were based on an assessment of increased winter grazing activity, however this approach assumed good management practices for winter grazing activity, which will not be a given under an un-audited management plan (light system). Fish and Game note, using examples such as poor farming techniques in regions like Canterbury and Southland, that poor management of critical source areas and overstocking can produce significant negative water quality effects from just a few poorly performing farms. Making the conservative 50% "plausible worst-case" scenario risky, when applying a permitted activity rule framework.	

<p>North Canterbury Fish and Game</p>	<p>In Fish and Game's view, the proposed 4t/N/per year in-river load offset (above existing) is very low, and reflects badly on the integrity of this plan change process. As does setting nutrient allocations for the Waiau River, before the schedule 2018 load limits are in place. Which is perhaps another disappointing indicator of where the Zone Committee and ECan's priorities really sit on this matter, despite "environment" being the first order priority under the CWMS. We therefore consider a higher Nitrogen (N) in-river load is more appropriate to account for these significant risks; and believe the potential for Phosphorous (P) loss from intensified dryland activity has also been underestimated. It is noted, but poorly analysed in the scientific risk assessments and S32 report, that changing stocking type and stocking ratio is also a major factor in relation to nutrient source loads and the justification for dryland farmers wanting more than a 10% buffer. Fish and Game notes that winter grazing alone is not the only major variable affecting off-farm losses, when factors such as the market, climate and other potential innovations will influence these losses and the plausible worst case scenario.</p>	<p>disagree with the submitters assessment. The load calculations have buffers built in at various points. For example, the plausible worst case scenario assumes winter grazing area will increase by 50% above average, and 20% increase on the maximum winter grazing area that has been observed to date and that occurred with less regulatory constraint and with significant market drivers (peak dairy prices)</p>
<p>North Canterbury Fish and Game</p>	<p>Fish and Game also strongly disagrees with the nutrient accounting used by ECan planners to justify the proposed allocation offset (by the irrigation schemes). The decision to treat 30t/N/year source load (as per the 2009-2013 baseline N loss + 10%) as an "actual" allocation in the plan, is not legal or appropriate, given it was never formally allocated within the total catchment loads prescribed in the operative HWRRP. It has also been argued in the S.32 report that it is unlikely most dryland farmers will reach the 10% limit, so why does PC1 allow for and effectively encourage farmers to go up to and beyond this existing capped limit? The contradiction continues within the S32 analysis, where it is argued that low intensity dryland farming is such a small contributor to catchment load, however in the case of a fully allocated catchment, the cumulative</p>	<p>Disagree with submitters analysis. Stand by justification in s32 report. The s32 report acknowledges that dryland is likely to develop beyond the anticipated 10% increase (i.e. up to 14% increase in source losses), and it is proposed that the increase, will be offset.</p>

	<p>effects of intensifying dryland activity are significant; especially when the NPS FM requirements of maintaining overall water quality and avoiding over-allocation are considered. Rule 10.2 (b) has the clear function of preventing nutrient over-allocation in the Hurunui Catchment, but going beyond the Schedule 1 allocations contravenes this rule and the NPS FM.</p>	
<p>North Canterbury Fish and Game</p>	<p>Fish and Game considers that 50 t/N/year “in-river-load” is a far more precautionary and equitable level of allocation to provide the dryland farming community, if the 10% change cap is to be removed and a more permissive system adopted. This was the offset amount originally offered by Amuri Irrigation in the former Nutrient Working Group process, in stark contrast to the 4 t/N/year source load being proposed in PC1.</p>	<p>There is no scientific basis for increasing the offset to 50t/N/year in river. Technical work supports an offset of 38t at source</p>
<p>North Canterbury Fish and Game</p>	<p>The S32 report also refers to an offset package being developed with key irrigation schemes in the Zone. What concerns Fish and Game is that the offset package is part of a wider mitigation package to continue avoidance of irrigation consent minimum flows; as intended to be implemented on Amuri Irrigation, under the operative HWRRP. It is not acceptable that the environmental trade-offs within this wider offset package, are not being considered within the S32 report. As effectively, the irrigation schemes are leveraging the dryland nutrient allocation “bale-out” with their own motivations to avoid tougher minimum flow restrictions. This situation further calls into question the conclusion that environmental effects from PC1 will be neutral. More disclosure and transparency is expected, to indicate the full environmental costs and benefits of any integrated offset packages.</p>	<p>The need to offset N load in the Hurunui is not connected to a review of water take consents. Regardless of what happens regarding minimum flows, PC1 will not progress without an offset for N load, or mechanism for offsetting N load, in place</p>
<p>North Canterbury Fish and Game</p>	<p>The S32 report makes several mentions of the collaborative approach that was used to develop PC1. The way this information is presented implies the collaborative approach successfully negotiated the hurdles associated with developing such a plan. However; no mention is made of the strong discontent by some of the significant stakeholders</p>	<p>A collaborative process was followed.</p>

	<p>in regard to how this process and its outcomes were achieved. It is important that a more accurate portrayal of the process is provided and at least acknowledgement there were some major points of divergence between the Zone Committee and some environmental parties. Noting that a Declaration to the Environment Court has been made with respect to the "Advice Note" for the 10% Rule, and the fact that Fish and Game decided to withdraw partway through the more recent 10% rule workshops, and later withdraw from the entire Zone Committee process.</p> <p>In regard to the Hurunui Waiau Zone Committee, North Canterbury Fish and Game does not currently recognise the legitimacy of this Zone Committee as a true representative of the community, given our experiences of the process and the biases it has created.</p>	
North Canterbury Fish and Game	<p>Under the currently proposed draft PC1, the environment will be the vehicle used to absorb the impact of additional dryland farming development, as has occurred across land uses in many other degraded parts of Canterbury to date. Fish and Game is not opposed to the concept of improving the equity situation for dryland farmers, but it is opposed to what is effectively an additional allocation grab, potentially pushing N discharges in the Hurunui catchment beyond a 30% N load increase from the pre-plan current state; along with potentially significant unintended consequences from additional P losses.</p>	<p>Disagree with submitter on this point. PC1 can only proceed if water quality is maintained or improved</p>
Forest & Bird	<p>The proposed Plan Change is predicated on an assumption that a mechanism to offset the effects of the Plan Change will be developed in future. An assumption has no sound basis to propose a Plan Change because submitters have little or no knowledge on exactly what it is they are submitting. My suggestion would be to establish the mechanism first.</p>	<p>We are working towards having that mechanism in place prior to Plan notification</p>
	<p>The S32 Report suggests that a wide range of stakeholders have been included in the discussion. Forest and Bird withdrew from the CWMS collaborative process some time ago for similar reasons cited by the North Canterbury Fish and Game Council.</p>	<p>A wide range of stakeholders were engaged through the CWMS process. There are still opportunities for stakeholders to engage</p>

	<p>With particular regard to the 10% rule Forest and Bird, in its frustrations, resorted to taking out a Declaration to the Environment court over the legality of the rule. This is yet to be determined. Therefore it is misleading to imply that discussion with “a wide range of stakeholders” occurred during the formation of the proposed Plan Change when key stakeholders representing the environmental sector have been side-lined and ignored.</p>	
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## Rules

Submitter	Feedback summary	Recommendations
Rural Advocacy Network	Oppose farm plan requirements [Rule 10.1A]	Retain. Reasons for pursuing farm plans are set out in the s32 report. Farm plan requirements are the most efficient and effective way of demonstrating water quality can be maintained, particularly with regard to sediment, bacterial contaminants and phosphorus.
Rural Advocacy Network	A mandatory approach to farm plans is unjustified and counter-productive. It does not recognise positive voluntary initiatives that have been promoted and embraced by dryland farmers	Retain. While we agree that dryland farmers have demonstrated kaitiakitanga and stewardship, the reasons for pursuing farm plan requirements are set out in the s32 report. Overall, the use of farm plans are the most efficient and effective way of managing risks to water quality, particularly from run-off, sediment, bacterial contaminants and phosphorus. Amend s32 report to acknowledge voluntary actions taken by farmers.
Rural Advocacy Network	Dryland farming does not have a significant effect on water quality and therefore there is no need for farm plans to manage effects.	Dryland farming does have a cumulative effect on water quality including a contribution of N and P load to the rivers (demonstrated in the s32 report).
Federated Farmers	Support amendment to Rule 10.1	
Federated Farmers	Support concepts in rule 10.1A but seeks that timing for when farms must be registered in the portal or subject to a dryland farmer collective be standardised	Standardise timing - make both 12 months after plan is operative
Federated Farmers	Concerned that information entered into farm portal is discoverable	acknowledge concern in s32 report
Federated Farmers	Concerned that management plans may be discoverable as official information	Rule does not provide for farms plans to become official information as ECan will not hold copies of farm plans.

Amuri Irrigation Company	To better enable nitrogen load offset by way of tributary pumping, create a new rule within section 3.1 to classify the taking of water from drains where the take will reduce the net nutrient load experienced in the Hurunui and/or Waiau catchments by, on average, more than 5 tonnes of N per year, as a restricted discretionary activity; or amend rule 2.3 to make clear that takes of water from drains is an RDA.	It is noted that the Plan (and in particular, Policy 2.10) currently enables the use of tributary pumping for nutrient management. The amendments sought are beyond the scope of the plan change
Amuri Irrigation Company	Change Rule 10.1(a) to remove the reference to "1st of January 2017". As the date has passed, it serves no resource management purpose	Consider if this is within scope
Amuri Irrigation Company	There are some farms that do not have the option to comply with the requirements of Rule 10.1(a) because the rule is date limited and the date has passed. Request the date is changed to provide farmers an opportunity to comply with Rule 10.1	This is beyond the scope of the Plan Change - we have identified a number of farmers we think may be caught in this bracket and the Zone Team are contacting them. Environment Canterbury has discretion to accept compliance with the rule after the date has passed, particularly where no resource management purpose is served by requiring consent
Amuri Irrigation Company	Rule 10.1A(a) the reference to "information about the farming activity and the property" is unhelpfully broad - amend to be clear what information needs to be updated	Specifying the information the portal requires will make the rule unnecessarily detailed. Could clarify "such information that is sought by the Farm Portal" noting that the definition of "Farm Portal" specifies that only the N-Check part of the portal is relevant
Amuri Irrigation Company	Rule 10.1A(a)(i)&(ii) - align the dates by which a farm must be registered in the Farm Portal or a member of a collective	align the dates so the requirement is 12 months after the plan is operative for both
Amuri Irrigation Company	Rule 10.1A(b) - clarify if a farm plan is required for each farm or for each farm enterprise and consider how farm enterprises could be accommodated in Rule 10.1A	The HWRRP framework does not contemplate nutrient management for farm enterprises. Instead the rules apply to each individual property. Rule 10.1A reflects this structure. Introducing the concept of nutrient management at the farm enterprise level for dryland farms (i.e. where farms in different parts of the catchment are operated as a single unit for the purpose of nutrient management), would undermine the concept of a "plausible worst case" increase in N for dryland farms as it removes some of the inherent constraints of a dryland farm to maximise an area of winter grazing.
Amuri Irrigation Company	10.1A(b) - remove the words "for viewing" as they are unnecessary	the words ensure it is clear that Environment Canterbury will not hold farm plan information and that farm

		plans are not discoverable as official information.
Amuri Irrigation Company	Rule 11.1 - include the words "restricted discretionary"	Rule 11.1 is not within the scope of the Plan Change
Beef+Lamb New Zealand	Support rule 10.1	
Beef+Lamb New Zealand	Reword Rule 10.1A to reflect assurances provided through consultation that ECan would not hold copies of management plans. Suggested wording: b) a Management Plan in accordance with Schedule 6 has been prepared and is implemented by [...] and is made available to the Canterbury Regional Council, on request, to be viewed only. The Canterbury Regional Council will not retain any copies of the Management Plan	Reword Rule 10.1A as requested - provides better clarification
Beef+Lamb New Zealand	support rule 10.2	
Beef+Lamb New Zealand	Amend Rule 11.1A as follows: Any change in land use (refer Part 5 – Definitions), in the Nutrient Management Area shown on Map 4, that does not comply with condition (b) of Rule 10.2 <u>and does not meet the definition of Low Intensity Dryland Farming</u> is a non-complying activity.	Retain Rule 11.1A as worded, noting that rule 11.1A is not within the scope of the plan change. Rule 11.1A is intended to apply to activities changing land use where a catchment is fully allocated in terms of nutrient allocation. To be considered a change in land use would necessarily mean a more intensive land use in terms of nutrient loss rate because anything less intensive should be able to remain within the definition of LIDF and therefore remain in the permitted activity rule framework under rule 10.1A. It is within the scheme of the Plan and the Plan's objectives that a change in land use from "low intensity dryland farming" to another type of land use would occur within a consenting framework.
Beef+Lamb New Zealand	Include a new rule making winter grazing a permitted activity as follows: Winter Grazing is a permitted activity provided that the area of the property used for Winter Grazing is less than: 1. 10% of the area of property, for any property between 100 hectares and 1000 hectares in area; or 2. 100 hectares, for any property greater than 1000 hectares in area.	The suggested rule is out of scope of the plan change in as far as it applies to activities other than low intensity dryland farming. The suggested additional rule is unnecessary as the winter grazing limits are only intended to apply to low intensity dryland farmers as a proxy for limiting increases in nutrient losses. Nutrient losses from other land uses are managed via rules 10.1 and 10.2 - 10.11A where permitted losses are capped at 10% above baseline and resource consent is required for intensification beyond 10%.

<p>North Canterbury Fish and Game</p>	<p>Fish and Game is supportive of dryland farmers adopting Good Management Practices (GMPs) through the development and application of management plans. However, there are some concerns with the suggested implementation and monitoring of these management plans (light) under proposed rule 10.1A. Under Plan Change 5, the management plans are subject to ECan “reviewing the implementation of Management Plans for permitted farming activities”. The way PC1 is written, farmers need only submit their plans to ECan on request. Given the management plans are not being audited, in the same way as Farm Environment Plans (under Plan Change 5), there is a very real concern that land users will not take the plans seriously, where no random on-farm compliance checking of plan implementation is to occur. Fish and Game would therefore strongly request that any inclusion of the management plan provision afford ECan the ability to carry out random checks of management plan accuracy and implementation on-farm, as is consistent with the PC5 provisions. This is not intended to catch-out the majority of land users, but rather to protect and encourage those farmers who do follow the rules and to ensure a process of continuous improvement is achieved.</p>	<p>Management plans for permitted activities under PC5 are only required to be submitted to ECan on request. There is no justification to require permitted activities in Hurunui Waiau to have audited Farm Environment Plans</p>
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### Definitions

<b>Submitter</b>	<b>Feedback summary</b>	<b>Recommendations</b>
<p>Hurunui District Landcare Group</p>	<p>Concerned wording of “winter grazing” definition will capture cattle contained in a paddock being fed supplementary feed such as hay. Suggest wording should include “behind portable wire”</p>	<p>The suggested amendment differs significantly from PC5 and would result in feed lot systems or other systems housed cattle systems potentially being treated as “low intensity dryland farming”. this is contrary to the purpose of the Plan Change. It is noted that the definition is almost identical to that used in PC5 to the LWRP. In the case of the LWRP, the definition has not been interpreted to capture cattle being fed supplements in a paddock.</p>
<p>Federated Farmers</p>	<p>Support definition of low intensity dryland farming in principle but seek reference to properties less than 100ha. Request that 10ha of winter grazing is permitted for properties</p>	<p>Address in s32 report - modelling for plausible worst case based on 10% area up to 100ha per property but with no lower limit</p>

	less than 100ha, consistent with PC5 to the LWRP	
Federated Farmers	Part C of the definition of low intensity dryland farming sets limits for pigs and poultry. There is no justification for the limits	Retaining status quo for pork and poultry (precautionary approach) while enabling domestic quantities. Address in s32 report
Federated Farmers	Supports definition of "Farm Portal" including the term "N Check"	
Federated Farmers	Supports the definition of winter grazing	
Amuri Irrigation Company	To better enable nitrogen load offset by way of tributary pumping, insert a definition into Part 5 of the HWRRP to make it clear that pumping of water from nutrient enriched drains for use in an efficient irrigation operation constitutes a "nutrient management system" under Policy 2.10	It is noted that the Plan (and in particular, Policy 2.10) currently enables the use of tributary pumping for nutrient management. The amendments sought are beyond the scope of the plan change
Amuri Irrigation Company	To better enable nitrogen load offset by way of tributary pumping, insert a definition of the term "net nutrient load reduction" into part 5 of the Plan. The definition would state that to derive the net nutrient load reduction, you need to first determine the nutrient load that will, in an average "hydrological year", be pumped from a drain, and then determine how much of that load will be taken up by pasture when it is irrigated to land. Once these tasks are completed, resource consent applicants will then need to determine the nutrient load that is expected to make its way back to surface or ground water	It is noted that the Plan (and in particular, Policy 2.10) currently enables the use of tributary pumping for nutrient management. The amendments sought are beyond the scope of the plan change
Amuri Irrigation Company	change the definition of "dryland farmer collective agreement" as follows: <i>"A Dryland Farmer Collective Agreement is an agreement that has been <del>approved</del> certified by the Canterbury Regional Council..."</i>	Retain current wording as it is consistent with the definition for other industry systems and agreements defined in the plan
Beef+Lamb New Zealand	Support definitions of: "change of land use", "low intensity dryland farming" and "dryland farmer collective agreement"	
Beef+Lamb New Zealand	Supplementary feed is not winter grazing. If supplementary feed needs to be managed it should not be included in the definition of "winter grazing. amend the winter grazing definition as follows: Means the grazing of cattle within the period of 1 May to 30 September where the cattle are contained for: break-feeding of in-situ brassica and root vegetable forage crops; or for	Amend as requested - the inclusion of supplementary feed confuses the definition of winter grazing and risks capturing feeding practices (like feeding out biallage) that are more similar in effect to feeding pasture than to break feeding crops

	<p>consuming supplementary feed that has been brought onto the property</p>	
<p>Hurunui District Council</p>	<p>The Hurunui Waiau Regional Plan, the Canterbury Air Regional Plan, the Canterbury Land and Water Regional Plan and the Hurunui District Plan each feature different definitions of intensive farming. While in part this is due to each plan managing a different effect of intensive farming the inconsistency can cause unnecessary confusion. See appendix 1. It is unclear through the information provided why 1,000 poultry is being used in this instance where 10,000 is the number used in the Canterbury Air Regional Plan. Can you please provide clarification as to why this is the case?</p>	<p>The HWRRP does not define "intensive farming". The definition of "dryland farming" is intended to limit the farms that Rule 10.1A applies to. All other permitted farming activities operate under Rules 10.1 and 10.2. In coming to an understanding of potential N losses from dryland farming under the draft plan change scenario (i.e. no 10% cap on nutrient losses, but some limitation in terms of irrigation and winter grazing area), the use for dryland farms for farming pork and poultry was not considered. The nutrient losses from poultry farming are not currently well quantified (i.e. there is no good information available that identifies the N and P losses likely from the various poultry farm systems), and pork farms that could meet the winter grazing and irrigation components of the "low intensity dryland farming" definition, are generally higher nutrient emitters than more extensive dryland farms. In the absence of certain information, a precautionary approach to poultry farming was taken and poultry farming was excluded from the definition of "low intensity dryland farming". Knowing that pork farming would likely operate at higher nutrient losses than was intended for "low intensity dryland farming", pork farming was excluded from the more lenient dryland farming rules. The exclusion of pork and poultry farming from the definition of "low intensity dryland farming" does not indicate that these farm types are "intensive". The effect of the definition is that pork and poultry farming are managed under rule 10.1 and 10.2 - essentially the status quo is retained. The reason that the keeping of some pigs or chickens is provided for within the definition of "low intensity dryland farming" is that it is reasonable to allow dryland farmers to keep some pigs and chickens either for consumption or as a supplementary income stream. The limits used for pork farms were the same limits identified in the Canterbury Air Regional Plan process where stakeholders (Federated Farmers in particular) identified that 25 weaned pigs or 6 sows is a reasonable</p>

		number to allow farmers without resource consent. The limits for poultry are not supported by any information that indicates 1000 chickens is the right number, but it is considered that it will allow dryland farmers flexibility to use chickens as a supplementary income stream while being sufficiently precautionary with regard to potential nutrient losses. The stocking rate (10 birds per hectare), was sought by the Zone Committee and provides an additional layer of precaution recognising that on smaller farms and lifestyle blocks the effects on water quality of 1000 chickens may be significant.
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#### Schedule – Dryland Farmer Collective Agreement

Submitter	Feedback summary	Recommendations
Hurunui District Landcare Group	Seek clarification on what would need to be reported to ECan via dryland farmer collective agreement	Provide clarification via s32 report
Amuri Irrigation Company	Amend Schedule 2A to state: "and address it to be <del>approved</del> certified by the Canterbury Regional Council..."	Retain wording as consistent with similar provisions in the Plan

#### Schedule – Management plans

Submitter	Feedback summary	Recommendations
Rural Advocacy Network	Seek identification of areas where schedule 6 differs from Schedule 2A in the LWRP (PC5)	This can be done in the s32 report, but not in the proposed plan change (the entire schedule is new to the HWRRP and will need to be identified as such). Clarify in s32 report.
Rural Advocacy Network	There was no consultation regarding the inclusion of "mahinga kai values..." in the farm plan content set out in schedule 6	This was inserted at the request of the Zone Committee. Inclusion of the clause is appropriate, and implementation will be supported by the provision of cultural land management advice. Clarify in s32 report
Rural Advocacy Network	The requirements for a Management Plan under the provisions of the LWRP includes: <i>(f) The location of any areas within or adjoining the property that are identified in a District Plan as "significant indigenous biodiversity"</i> . Draft PC1 to the HWRRL requires: <i>(f) "The location of any areas within or adjoining the property that meet the criteria of "significant indigenous biodiversity in the Hurunui District Plan."</i> This difference between the two schedules has huge implications & captures all landowners into costly significance assessments. The	Delete item (2)(f) from Part B of Schedule 6. The requirement to to identify areas that meet the criteria of significant indigenous biodiversity is overly onerous for a permitted activity. It would require farmers to employ an ecologist to undertake an ecological assessment of any part of a farm with indigenous biodiversity. The Hurunui District Plan has provisions for the protection of indigenous biodiversity, and the requirement for the identification of those areas duplicates the HDP requirements.

	Hurunui District Council at the last plan review in 2016 removed identified SNAs. Further the wording "adjoining the property" has not been removed as I understood was requested by the Zone Committee.	
Federated Farmers	In the table of practices, the fourth box referring to mahinga kai is likely to be contentious and should not be included until after a widespread conversation about mahinga kai values	Retain item in table as it gives assists in maintaining Ngai Tahu values
Federated Farmers	Management Plan default content - remove item 2(e) (the location on all waterways where stock access or crossing occurs) as the requirement is unrealistic in hill country situations	retain - GMP anticipates stock access to waterbodies is managed
Federated Farmers	Management Plan default content - remove item 2(f) (the location of any areas within or adjoining the property that meet the criteria of "significant indigenous biodiversity" in the Hurunui District Plan) - The item is not relevant	Remove item 2(f) It is unlikely farmers will be aware of all sites that meet the criteria of "significant indigenous biodiversity" on their property or on neighbouring properties
Federated Farmers	In Part 3 – the location of any source of phosphorus loss should refer to critical source areas for phosphorus loss and require farm plans to state how those critical source areas will be managed	Agree – refer to critical source areas for phosphorus
Federated Farmers	The table of practices and on farm actions should be amended as follows: The box referring to application systems being maintained and operated should be amended to include a definition of "efficiently" as follows "... efficiently, to give effect to the requirements above (meet agronomic requirements and not exceed soil water holding capacity)"	the amendment is useful – amend draft PC as sought
Federated Farmers	In the table of practices, the ninth box should be amended as follows: Where practicable and likely to be effective vegetated buffer strips are in place...	Agree – amend plan change as sought by submission
Federated Farmers	In the table of practices, the eighth box referring to riparian margins would be more useful if it referred to critical source areas for phosphorus and ask farmers how they will be managed rather than identifying vegetated margins as the key management tool	Agree – amend plan change as sought by submission.
Amuri Irrigation Company	support flexibility within Part A of schedule 6	
Amuri Irrigation Company	Request part B (2)(f) [requirement to map areas meeting criteria for significant indigenous biodiversity] be deleted	Delete provision - overly onerous to require ecological assessment in the context of a permitted activity farm management plan

Amuri Irrigation Company	Part B (3) requires clarification as it may not be possible to determine "any source of phosphorus loss"	amend to refer to "critical phosphorus loss areas"
Amuri Irrigation Company	align review period for management plan updates with requirements to update farm portal information (every 36 months)	Retain requirement for annual review. Annual updates will enable review of practices as the location of certain elements, such as winter grazing, moves about the farm. A farm plan prepared in a year where winter grazing is located closer to a waterbody may not be appropriate the following year when winter grazing is located away from the waterbody but on steeper ground.
Amuri Irrigation Company	<p>the definition of dryland farming could result in significant localised adverse effects from losses of nitrogen, phosphorus, sediment and run-off of other contaminants such as e.coli. To address this, AIC suggest the following changes to the table in schedule 6:</p> <ol style="list-style-type: none"> <li>1. Reference should be made to the 'Industry-agreed Good Management Practices relating to water quality' that were published 2016 and the accepted minimum standard for farming in Canterbury. With that publication in mind, we now propose some specific changes to the table of practices: <ul style="list-style-type: none"> <li>1. Boxes 1 and 2 should refer to, and require compliance with the Good Management Practice (or 'GMP') standards for effluent and fertiliser.</li> <li>2. Box 3 should require that the activities on site also meet applicable rules (as set out in the Council's statutory planning instruments) that relate to refuse and ofal pits, and to the burning of waste.</li> <li>3. Box 5 should refer to, and require compliance with the GMP for the storage and use of fertiliser.</li> <li>4. Box 9 should require the preparation of a winter forage management plan that identifies the critical source areas for P and N loss and sets out the management practices that are proposed to minimise the risks of run-off to waterways and again refer to and require compliance with</li> </ul> </li> </ol>	Retain current table. While the suggested changes would provide a more comprehensive package in terms of managing localised adverse effects, it goes much further than what consultation material to date has indicated. In addition it goes further than what is required under the LWRP for permitted farming activities, which includes permitted irrigated farming. The changes suggested hold dryland farmers in the Hurunui zone to a much higher standard than what is required regionally, with little justification.

	<p>the applicable GMP standards.</p> <p>2. We note that there is no mention of soil management in the table of practices. We think that this should be added into the table, and that it should refer to, and require compliance with the applicable GMP standards.</p> <p>3. A note should also be inserted at the end of the table of practices making it clear that the Management Plans are prepared by a suitably qualified person with a good understanding of GMP standards and practices.</p> <p>3. A second note should be added at the end of the table of practices to also make it clear that the farming practices being conducted on the property should be reviewed against the Management Plans once every three years (or when there is a significant change to boundaries or a the uses on the property). Such reviews do not need to be a formal audit or undertaken by the Council or an approved Farm Environment Plan Auditor. Rather, we see them as being a less formal inspection that is undertaken by a suitably qualified person with a good understanding of GMP practices and standards.</p>	
<p>Hurunui District Council</p>	<p>Schedule 6 Management Plan for Low Intensity Dryland Farming Activities includes "mahinga kai values are identified and protected where possible". The Hurunui District Council believes all farmers should be striving to protect mahinga kai but is concerned of the onerous task of identifying mahinga kai given the limited number of people qualified to do so.</p> <p>Council recommends that the template is amended to acknowledge the importance of protecting mahinga kai while ensuring it is feasible for farmers to meet their requirements under the plan. Council is also supportive of working with a Cultural Advisor to improve the knowledge of farmers in relation to mahinga kai.</p>	<p>Amend the "farm practice" description as follows:  "Where practicable and where assistance is available either from the Canterbury Regional Council or from tangata whenua, mahinga kai values are identified and protected.</p>