

**From:** [Hannah Ritchie](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 LWRP Further Submission  
**Date:** Thursday, 5 December 2019 11:06:57 AM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[NZPork Further Submission on Plan Change 7 to the CLWRP.pdf](#)

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Hi

Please find attached a further submission to PC7 from the New Zealand Pork Industry Board.

Kind Regards

Hannah

**Hannah Ritchie**

Senior Environmental Advisor

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New Zealand Pork Industry Board

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## Further Submission on Plan Change 7 to the Canterbury Land and Water Regional Plan

Form 6: Further Submissions in support of, or in opposition to, submission on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 8 of Schedule 1 of the Resource Management Act 1991.

Return your signed submission by **5.00pm 29 November 2019** to:

Customer Services  
Environment Canterbury  
P O Box 345  
Christchurch 8140

or

by email to [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)  
with "Plan Change 7 LWRP Further Submission"  
in the subject line

<b>Full Name:</b> Hannah Ritchie _____	<b>Phone (Hm):</b> _____
<b>Organisation*:</b> New Zealand Pork Industry Board _____ <small>* the organisation that this submission is made on behalf of</small>	<b>Phone (Wk):</b> _____
<b>Postal Address:</b> PO Box 20-176, Christchurch, _____	<b>Phone (Cell):</b> 027 201 6261 _____
_____	<b>Postcode:</b> 8543 _____
<b>Email:</b> Hannah.ritchie@pork.co.nz _____	<b>Fax:</b> _____
<b>Contact name and postal address for service of person making submission</b> (if different from above): _____ _____	

**Only certain people can make further submissions. Please tick the option that applies to you:**

I am a person representing a relevant aspect of the public interest; or

I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or

I am the local authority for the relevant area.

<input type="checkbox"/>	I <u>do not</u> wish to be heard in support of my submission; or
<input checked="" type="checkbox"/>	I <u>do</u> wish to be heard in support of my submission; and if so,
<input checked="" type="checkbox"/>	I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

**Service of your further submission:**  
Please note: any person making a further submission must **serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Environment Canterbury**. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

**Signature:** Hannah Ritchie \_\_\_\_\_ **Date:** 5.12.19 \_\_\_\_\_

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:  
(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

<b>(1)</b> I support or oppose the submission of:	<b>(2)</b> The particular parts of the submission I support or oppose are:	<b>(3)</b> The reasons for my support or opposition are:	<b>(3)</b> I seek that the whole or part [as per column 2] of the submission be allowed or disallowed:
<i>Name &amp; postal address of original submission</i>	<i>Submission point reference number i.e. 4.23</i>	<i>Provide reason for support or opposition</i>	<i>Allow or disallow</i>
Beef + Lamb New Zealand	<b>PC7-214.1</b> <b>Topic: General Support</b> <i>Supports the sub catchment approach to sustainable and integrated management of land and water resources</i>	NZPork supports sub catchment management as an effective system of managing land and water resources that can be owned by the community, and which best provides for the economic, social, and cultural wellbeing of those communities.	Allow
Waimakariri Irrigation Limited (WIL)	<b>PC7-349.23</b> <b>Topic: Section 32 Evaluation Report</b> <i>Require Council to better consider the costs associated with the proposed reductions required by Table 8-9, and provide greater clarity as to whether further land uses are available that would address the concerns set out (e.g. lifestyle blocks).</i>	NZPork supports further Section 32 evaluation of the impact of the proposed provisions to enable affected parties to more thoroughly assess and understand the implications of the proposals, particularly in relation to the potential and likely costs associated with proposed reductions in nitrogen discharge and reduced availability of water supply.	Allow
Ballance Agri-Nutrients Limited	<b>PC7-441.48</b> <b>Topic: Section 32 Evaluation Report</b> <i>Require Council to take into account the impact of the proposed provisions on the physical and financial performance on-farm.</i>	NZPork supports further Section 32 evaluation of the impact of the proposed provisions to enable affected parties to more thoroughly assess and understand the implications of the proposals, particularly in relation to the potential and likely costs associated with proposed reductions in nitrogen discharge and reduced availability of water supply.	Allow
Combined Canterbury Provinces, Federated Farmers of New Zealand	<b>PC7-430.290</b> <b>Topic: Section 32 Evaluation Report</b> <i>Require Council to undertake a greater level of analysis, particularly with regard to the potential and likely costs</i>	NZPork supports further Section 32 evaluation of the impact of the proposed provisions to enable affected parties to more thoroughly assess and understand the implications of the proposals, particularly in relation to the potential and likely costs associated with proposed	Allow

	<p><i>associated with the implementation of the Waimakariri and OTOP sections (especially provisions related to reduction in the reliability of water supply and nitrogen reductions).</i></p>	<p>reductions in nitrogen discharge and reduced availability of water supply.</p>	
Dairy Holdings Limited (DHL)	<p><b>PC7-415.63</b></p> <p><b>Topic: Section 32 Evaluation Report</b></p> <p><i>Require Council to appropriately assess the impacts of the catchment modelling for Section 8.</i></p>	<p>NZPork supports further Section 32 evaluation of the impact of the proposed provisions to enable affected parties to more thoroughly assess and understand the implications of the proposals, particularly in relation to the potential and likely costs associated with proposed reductions in nitrogen discharge and reduced availability of water supply.</p>	Allow
South Canterbury Chamber of Commerce	<p><b>PC7-340.1</b></p> <p><b>Topic: Section 32 Evaluation Report</b></p> <p><i>Direct a full assessment of the anticipated costs of the implementation of PC7 to replace the inadequate economic work which informs Part B of PC7.</i></p>	<p>NZPork supports further Section 32 evaluation of the impact of the proposed provisions to enable affected parties to more thoroughly assess and understand the implications of the proposals, particularly in relation to the potential and likely costs associated with proposed reductions in nitrogen discharge and reduced availability of water supply.</p>	Allow
Christchurch City Council	<p><b>PC7-337.146</b></p> <p><b>Topic: Section 32 Evaluation Report</b></p> <p><i>Require that the s32 report includes the costs of removing nitrate from the water supply needs to be assessed, and an assessment needs to be provided on an alternative scenario in which nitrate nitrogen levels are kept considerably lower</i></p>	<p>.</p> <p>NZPork supports further Section 32 evaluation of the impact of the proposed provisions to enable affected parties to more thoroughly assess and understand the implications of the proposals, particularly in relation to the potential and likely costs associated with proposed reductions in nitrogen discharge and reduced availability of water supply.</p>	Allow
Christchurch City Council	<p><b>PC7-337.179</b></p> <p><b>Topic: Section 32 Evaluation Report</b></p> <p><i>Require Council to undertake a proper alternatives evaluation in its Section 32 for Table 8-9, given the economic, social, recreational, and environmental value of the Christchurch aquifers as a drinking water supply for Christchurch and its</i></p>	<p>NZPork supports further Section 32 evaluation of the impact of the proposed provisions to enable affected parties to more thoroughly assess and understand the implications of the proposals, particularly in relation to the potential and likely costs associated with proposed reductions in nitrogen discharge and reduced availability of water supply.</p>	Allow

	<i>contribution to maintaining ecological values in spring-fed rivers.</i>		
Opuha Water Limited	<p><b>PC7-381.166</b></p> <p><b>Topic: Section 32 Evaluation Report</b></p> <p><i>Opposes lack of technical and environmental justifications in the Section 32 report and supporting technical assessments for the proposed 'alternative management regime' in Part B of PC7.</i></p>	NZPork supports further Section 32 evaluation of the impact of the proposed provisions to enable affected parties to more thoroughly assess and understand the implications of the proposals, particularly in relation to the potential and likely costs associated with proposed reductions in nitrogen discharge and reduced availability of water supply.	Allow
Waimakariri Next Generation Farmers Trust	<p><b>PC7-425.33</b></p> <p><b>Topic: Legal Issues</b></p> <p><i>Require the timeframes for the provision of evidence and the hearings on PC7 be delayed to allow the implications of the finalised new NPS-FM and NES-FW to be fully considered in terms of their relationship with PC7.</i></p>	NZPork is concerned with the progression of PC7 in a changing and uncertain policy environment.	Allow
Egg Producer Federation NZ and Poultry Industry Association NZ	<p><b>PC7-197.1</b></p> <p><b>Topic: Overseer</b></p> <p><i>Amend poultry farming provisions reliance on Overseer with no specific decision requested</i></p>	NZPork seeks clarification that the nutrient management rule framework proposed in rules 8.5.21 – 8.5.29 and 14.5.14 - 14.5.22 is not intended to capture stock farmed wholly indoors, where discharges to the environment are point source in nature and are controlled by provisions in region wide rules 5.29 – 5.37.	Allow
Egg Producer Federation NZ and Poultry Industry Association NZ	<p><b>PC7-197.24</b></p> <p><b>Topic: Overseer</b></p> <p><i>Require development of an appropriate framework for the assessment of nitrogen loss for the Poultry Industry.</i></p>	NZPork seeks clarification that the nutrient management rule framework proposed in rules 8.5.21 – 8.5.29 and 14.5.14 - 14.5.22 is not intended to capture stock farmed wholly indoors, where discharges to the environment are point source in nature and are controlled by provisions in region wide rules 5.29 – 5.37.	Allow
Egg Producer Federation NZ and Poultry Industry Association NZ	<p><b>PC7-197.23</b></p>	NZPork supports provisions that allow for shed washdown as part of a reasonable use assessment of	Allow

	<p><b>Topic: Water quantity (volume / rate)</b></p> <p><i>Amend the meaning of 'reasonable' by including a criteria to determine if the proposed water take is reasonable.</i></p>	<p>water. The use of water to maintain high hygiene standards within piggeries is essential for environmental considerations (e.g odour minimisation) and to provide for animal welfare.</p>	
Egg Producer Federation NZ and Poultry Industry Association NZ	<p><b>PC7-197.25</b></p> <p><b>Topic: Water quantity (volume / rate)</b></p> <p><i>Require amendment to provisions regarding reasonable water use.</i></p>	<p>NZPork supports provisions that allow for shed washdown as part of a reasonable use assessment of water. The use of water to maintain high hygiene standards within piggeries is essential for environmental considerations (e.g .odour minimisation) and to provide for animal welfare. Planned reductions in water takes should not compromise the ability of existing operations to provide for the wellbeing of their stock or to comply with air discharge consent conditions to minimise odour.</p>	Allow
Horticulture New Zealand	<p><b>PC7-356.69</b></p> <p><b>Topic: Water quantity (volume / rate)</b></p> <p><i>Require the reasonable use test to allow for tangible planned water use when renewing a water permit.</i></p>	<p>NZPork supports a reasonable use test for water use.</p>	Allow
Water and Wildlife Habitat Trust	<p><b>PC7-88.42</b></p> <p><b>Topic: Nitrate – Reductions</b></p> <p><i>Amend plan change 7 to increase the proposed % N reductions by 30%.</i></p>	<p>NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects</p>	Disallow
Water and Wildlife Habitat Trust	<p><b>PC7-348.2</b></p> <p><b>Topic: Nitrate – Reductions</b></p> <p><i>Amend Plan Change 7 to shorten timelines for reducing nitrate losses from</i></p>	<p>NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and</p>	Disallow

	<i>land.</i>	social effects of compliance. For the successful implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects	
Waimate District Council	<p><b>PC7-279.13</b></p> <p><b>Topic: Nitrate – Reductions</b></p> <p><i>Amend nitrate reduction targets to be met 100% by 2030 provided economic viability of best practice farming is not jeopardised.</i></p>	NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects	Disallow
Richmond Residents and Business Association (RR&BA)	<p><b>PC7-455.8</b></p> <p><b>Topic: Nitrate – Reductions</b></p> <p><i>Amend Plan Change 7 to have more ambitious nitrate reductions and a shorter timeframe to achieve them</i></p>	<p>.</p> <p>NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects</p>	Disallow
Combined Canterbury Provinces, Federated Farmers of New Zealand	<p><b>PC7-430.289</b></p> <p><b>Topic: Farm Portal</b></p> <p><i>Amend the plan change to resolve current issues with the Farm Portal and</i></p>	NZPork supports ongoing improvement in the Farm Portal and development of alternatives where necessary.	Allow

	<p><i>develop a cost-effective process to cover other farm systems (such as arable) which are unable to be modelled by Overseer.</i></p>		
Ravensdown Limited	<p><b>PC7-114.110</b></p> <p><b>Topic: Farm Portal</b></p> <p><i>Supports the provision of an alternative consent pathway, as provided for by way of a relevant policy and associated rules, within the OTOP and Waimakariri sub-regions in circumstances where Council's Farm Portal cannot accurately generate the required Baseline GMP Loss Rate or Good Management Practice Loss Rate.</i></p>	NZPork supports ongoing improvement in the Farm Portal and development of alternatives where necessary.	Allow
Ravensdown Limited	<p>PC7-114.112</p> <p><b>Topic: Good Management Practice</b></p> <p><i>Supports the requirement for farming activities, including CVGO, to implement GMP and to prepare and implement FEPs and/or Management Plans, in accordance with Schedule 7A of the LWRP, for some permitted activities.</i></p>	NZPork supports the implementation of GMP and Farm Environment Plans and/or Management Plans to support and demonstrate environmental good practice.	Allow
Water and Wildlife Habitat Trust	<p><b>PC7-88.43</b></p> <p><b>Topic: Good Management Practice</b></p> <p><i>Amend PC7 to require 100% A rating farm audits by 2025.</i></p>	NZPork opposes unreasonable and unachievable regulatory timeframes.	Disallow
Waimate District Council	<p><b>PC7-279.10</b></p> <p><b>Topic: Stock Exclusion from waterways</b></p> <p><i>Amend stock exclusion provisions to exempt any enclosed stag or pig wallows</i></p>	NZPork supports the exemption of enclosed wallows from stock exclusion provisions. Wallows provide a welfare function on farms, assisting pigs in thermoregulation and parasite control, as well as allowing animals to participate in natural social behaviours. Good Management Practice for outdoor piggeries prevents runoff from wallows	Allow

	<i>which are for animal welfare purposes.</i>	entering a waterway.	
Water and Wildlife Habitat Trust	<b>PC7-88.21</b> <b>Topic: General</b> <i>Amend Plan change 7 to map and include regulatory protection of spiritual and community values via the farm environment plan regime.</i>	NZPork oppose the extension of the farm environment plan regime to undefined spiritual and community values.	Disallow
Water and Wildlife Habitat Trust	<b>PC7-88.29</b> <b>Topic: General</b> <i>Amend Plan Change 7 to secure waterways and wetland protection zones, including riparian areas via covenants on private land titles and district planning zones on public land.</i>	NZPork oppose the blanket imposition of inefficient and ineffective regulatory controls on private property. The management of waterways and wetlands on private properties undertaking farming activities will be the subject of a farm environment plan or farm management plan, in accordance with Schedule 7/7a, which includes objectives and targets for managing waterbodies.	Disallow
Department of Conservation	PC7-160.29	NZPork oppose the inability to undertake maintenance of farm drains, ponds and dams. Regular removal of vegetation is necessary to maintain channel capacity and efficient land drainage and as such will likely be required periodically on farm to maintain functionality.	Disallow
Beef + Lamb New Zealand	<b>PC7-214.8</b> <b>Topic: 04.006</b> <i>Retain Policy 4.6 as notified</i>	NZPork supports the retention of policy to protect stockwater needs.	Allow
Timaru District Council	<b>PC7-292.1</b> <b>Topic: 04.006</b> <i>Retain Policy 4.6 as notified</i>	NZPork supports the retention of policy to protect stockwater needs.	Allow
Beef + Lamb New Zealand	<b>PC7-214.13</b> <b>Topic: 04.047</b>	NZPork supports the retention of policy to protect stockwater needs.	Allow

	<i>Retain Policy 4.47 as notified</i>		
Ravensdown Limited	<p><b>PC7-114.6</b></p> <p><b>Topic: 04.103</b></p> <p><i>Amend Policy 4.103 as follows:</i></p> <p><i>Any resource consent granted with a consent condition requiring the collection of water quality samples, shall also include a condition requiring, <u>where feasible</u>, all water quality sample data to be submitted to the Canterbury Regional Council in a format suitable for automated upload to the Council's water quality database software.</i></p>	NZPork supports the provision of data in a suitable format to assist with freshwater quality monitoring and accounting however consent holders may have technology or access constraints that limit the capability to meet Councils data transfer specifications.	Allow
Christchurch City Council	<p><b>PC7-337.14</b></p> <p><b>Topic: 04.103</b></p> <p><i>Amend Policy 4.103 to clearly word the provision as a policy, alternatively relocate it to the rules section</i></p>	NZPork supports the provision of data in a suitable format to assist with freshwater quality monitoring and accounting however consent holders may have technology or access constraints that limit the capability to meet Councils data transfer specifications.	Allow
Woodbury Deer Industry Environment Group	<p><b>PC7-271.13</b></p> <p><b>Topic: 05.024</b></p> <p><i>Amend Rule 5.24 to use 'seasonal high water table' definition as the base line for the 3m allowance of condition 5c.</i></p>	NZPork supports retaining the use of seasonal high-water level as an appropriate measure for existing offal pits to prevent non-compliance of formerly compliant pits and the potential need for remediation or relocation of pits that were created in good faith with the previous rule.	Allow
Brook & Rupert Partnership	<p><b>PC7-150.5</b></p> <p><b>Topic: 05.024</b></p> <p><i>Amend Rule 5.24 to delete "highest groundwater level" and replace with "seasonal high water table".</i></p>	NZPork supports retaining the use of seasonal high-water level as an appropriate measure for existing offal pits to prevent non-compliance of formerly compliant pits and the potential need for remediation or relocation of pits that were created in good faith with the previous rule.	Allow
Beef + Lamb New Zealand	<b>PC7-214.30</b>	NZPork supports retaining the use of seasonal high-water level as an appropriate measure for existing offal pits to	Allow

	<p><b>Topic: 05.024</b></p> <p><i>Amend condition 5(c) of Rule 5.24 as follows:</i></p> <p>5. ...</p> <p>...</p> <p><i>c. unless there is at least 3 m of soil or sand between the point of discharge and the highest groundwater level <u>for new, modified, or upgraded offal pits, or cc. unless there is at least 3 m of soil or sand between the point of discharge and the seasonal high water table level for existing offal pits.</u></i></p>	prevent non-compliance of formerly compliant pits and the potential need for remediation or relocation of pits that were created in good faith with the previous rule.	
Ravensdown Limited	<p><b>PC7-114.7</b></p> <p><b>Topic: 05.026A</b></p> <p><i>Retain Rule 5.26A as notified.</i></p>	NZPork support the discretionary activity status for offal pits and associated discharges unable to meet the condition of Rule 5.26.	Allow
Combined Canterbury Provinces, Federated Farmers of New Zealand	<p><b>PC7-430.19</b></p> <p><b>Topic: 05.026A</b></p> <p><i>Retain Rule 5.26A as notified.</i></p>	NZPork support the discretionary activity status for offal pits and associated discharges unable to meet the condition of Rule 5.26.	Allow
Horticulture New Zealand	<p><b>PC7-356.25</b></p> <p><b>Topic: 05.026A</b></p> <p><i>Retain Rule 5.26A as notified.</i></p>	NZPork support the discretionary activity status for offal pits and associated discharges unable to meet the condition of Rule 5.26.	Allow
Department of Conservation	<p><b>PC7-160.10</b></p> <p><b>Topic: 05.026A</b></p> <p><i>Amend the activity status for Rule 5.26A to non-complying</i></p>	NZPork support the discretionary activity status for offal pits and associated discharges unable to meet the condition of Rule 5.26.	Disallow

Beef + Lamb New Zealand	<p><b>PC7-214.33</b></p> <p><b>Topic: 05.027</b></p> <p><i>Amend Rule 5.27 as follows:</i></p> <p><i>5(c) unless there is at least 3 m of soil or sand between the point of discharge and the highest groundwater level for new, modified, or upgraded on-site refuse pits, or cc. unless there is at least 3 m of soil or sand between the point of discharge and the seasonal high water table level for existing on-site refuse pits, or</i></p>	NZPork supports retaining the use of seasonal high-water level as an appropriate measure for existing refuse pits to prevent non-compliance of formerly compliant pits and the potential need for remediation or relocation of pits that were created in good faith with the previous rule.	Allow
Horticulture New Zealand	<p><b>PC7-356.27</b></p> <p><b>Topic: 05.028</b></p> <p><i>Retain Rule 5.28 as notified.</i></p>	NZPork support the restricted discretionary activity status for on-site refuse disposal pits and associated discharges unable to meet the condition of Rule 5.27.	Allow
Horticulture New Zealand	<p><b>PC7-356.28</b></p> <p><b>Topic: 05.028A</b></p> <p><i>Retain Rule 5.28A as notified.</i></p>	NZPork support the discretionary activity status for on-site refuse disposal pits and associated discharges unable to meet the conditions of Rule 5.28.	Allow
Department of Conservation	<p><b>PC7-160.11</b></p> <p><b>Topic: 05.028A</b></p> <p><i>Amend the activity status of Rule 5.28A to non-complying.</i></p>	NZPork support the discretionary activity status for on-site refuse disposal pits and associated discharges unable to meet the condition of Rule 5.28.	Disallow
Ravensdown Limited	<p><b>PC7-114.16</b></p> <p><b>Topic: 05.063</b></p> <p><i>Retain Rule 5.63 as notified.</i></p>	NZPork supports the plans structure than provides for discharges (s15) as a permitted activity provided the land use (s9) has been authorised.	Allow
Beef + Lamb New Zealand	<p><b>PC7-214.45</b></p> <p><b>Topic: 05.063</b></p>	NZPork supports the plans structure than provides for discharges (s15) as a permitted activity provided the land use (s9) has been authorised.	Allow

	<i>Retain Rule 5.63 as notified.</i>		
Royal Forest & Bird Protection Society Inc.	<p><b>PC7-472.52</b></p> <p><b>Topic: 05.063</b></p> <p><i>Amend the activity status of Rule 5.63 to non-complying.</i></p>	NZPork supports the plans structure than provides for discharges (s15) as a permitted activity provided the land use (s9) has been authorised.	Disallow
Christchurch City Council	<p><b>PC7-337.142</b></p> <p><b>Topic: Nitrate – Reductions</b></p> <p><i>Require that the reduction targets are increased (such as those provided in Table 8-9) and are brought forward such that nitrate nitrogen concentrations predicted to enter the Christchurch aquifer system are abated over shorter timeframes and nutrient loads are attenuated more quickly.</i></p>	NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects	Disallow
DairyNZ Limited	<p><b>PC7-357.18</b></p> <p><b>Topic: 08.04.27</b></p> <p><i>Amend Policy 8.4.27 to insert a new clause as follows:</i></p> <p><i><u>f. the extent to which the applicant is affected by additive impacts of increased minimum flows and nitrogen loss rate reductions.</u></i></p>	NZPork opposes unreasonable and unachievable regulatory timeframes and supports a policy that recognises and provides for flexibility in situations where N loss rate reductions are unable to be achieved by specified dates and time extensions are required.	Allow
Christchurch City Council	<p><b>PC7-337.94</b></p> <p><b>Topic: 08.04.27</b></p> <p><i>Amend clause (e) of Policy 8.4.27 as follows:</i></p> <p><i>e. <del>progress made towards achieving nitrate-nitrogen limits and targets in</del></i></p>	NZPork opposes unreasonable and unachievable regulatory timeframes and supports a policy that recognises and provides for flexibility in situations where N loss rate reductions are unable to be achieved by specified dates and time extensions are required.	Disallow

	<i>Tables 8-5, 8-6, 8-7 and 8-8.</i>		
Ravensdown Limited	<b>PC7-114.80</b> <b>Topic: 08.05.21</b> <i>Retain Rule 8.5.21 as notified.</i>	NZPork supports the retention of a permitted activity land use threshold for nutrient management.	Allow
Combined Canterbury Provinces, Federated Farmers of New Zealand	<b>PC7-430.122</b> <b>Topic: 08.05.21</b> <i>Retain Rule 8.5.21 as notified.</i>	NZPork supports the retention of a permitted activity land use threshold for nutrient management.	Allow
Egg Producer Federation NZ and Poultry Industry Association NZ	<b>PC7-197.19</b> <b>Topic: 08.05.21</b> <i>Amend threshold area in Rule 8.5.21 for permitted farming activities.</i>	NZPork supports the retention of a permitted activity land use threshold for nutrient management.	Allow
Kaipoi-Tuahiwi Community Board	<b>PC7-42.41</b> <b>Topic: 08.07.03 Table 8-8</b> <i>Amend Table 8-8 to set an earlier target timeframe of 2040.</i>	NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects	Disallow
Rangiora-Ashley Community Board	<b>PC7-149.41</b> <b>Topic: 08.07.03. Table 8-8</b> <i>Amend Table 8-8 to set an earlier target timeframe of 2040.</i>	NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful	Disallow

		implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects	
Royal Forest & Bird Protection Society Inc.	<p><b>PC7-472.127</b></p> <p><b>Topic: 08.07.03. Table 8-8</b></p> <p><i>Amend the timeframe for actions to achieve the nitrate targets in Table 8-8 to be implemented from 1 January 2080 to 1 January 2030.</i></p>	NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects	Disallow
Waimakariri District Council	<p><b>PC7-3.38</b></p> <p><b>Topic: 08.07.03. Table 8-8</b></p> <p><i>Amend Table 8-8 to set an earlier target timeframe of 2040</i></p>	NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects	Disallow
Woodend-Sefton Community Board	<p><b>PC7-107.41</b></p> <p><b>Topic: 08.07.03 Table. 8-8</b></p> <p><i>Amend Table 8-8 to set an earlier target timeframe of 2040</i></p>	<p>.</p> <p>NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful</p>	Disallow

		implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects	
Christchurch City Council	<p><b>PC7-337.107</b></p> <p><b>Topic: 08.07.03. Table. 8-8</b></p> <p><i>Amend Table 8-9 to include tighter timeframes for achieving the required nitrogen loss reductions:</i></p> <p><i>Sub Area A</i></p> <p><i>Dairy by January 2030: <del>45%</del> <u>40%</u></i></p> <p><i>Dairy by January 2040: <del>30%</del> <u>60%</u></i></p> <p><i>Dairy by January 2050: <u>80%</u></i></p> <p><i>All other by January 2030: <del>5%</del> <u>20%</u></i></p> <p><i>All other by January 2040: <del>40%</del> <u>30%</u></i></p> <p><i>All other by January 2050: <u>40%</u></i></p>	NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects	Disallow
Christchurch City Council	<p><b>PC7-337.168</b></p> <p><b>Topic: 08.07.03. Table 8-9</b></p> <p><i>Amend Table 8-9 to meet lower nitrate water quality limits and thresholds, shorten the timeframes and amalgamate zones as appropriate:</i></p> <p><i>Sub Area A</i></p> <p><i>Dairy by January 2030: <del>45%</del> <u>40%</u></i></p> <p><i>Dairy by January 2040: <del>30%</del> <u>60%</u></i></p> <p><i>Dairy by January 2050: <u>80%</u></i></p> <p><i>All other by January 2030: <del>5%</del> <u>20%</u></i></p>	NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects	Disallow

	<p>All other by January 2040: <del>40%</del> <u>30%</u></p> <p>All other by January 2050: <u>40%</u></p>		
North Canterbury Fish and Game Council	<p><b>PC7-95.102</b></p> <p><b>Topic: 08.07.03. Table 8-9</b></p> <p><i>Amend Table 8-9 to change the reduction achievement dates as follows:</i></p> <ul style="list-style-type: none"> <li>- Dairy sub-areas A to E 15% reduction by <del>2030</del> <u>2027</u>;</li> <li>- Dairy sub-areas A to E 30% reduction by <del>2040</del> <u>2032</u>;</li> <li>- All other sub-areas A to E 5% reduction by <del>2030</del> <u>2027</u>;</li> <li>- All other sub-areas A to E 10% reduction by <del>2040</del> <u>2032</u>; and</li> <li>- For all improvements for 2050 and beyond, bring forward the dates by ten years respectively.</li> </ul>	<p>NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects</p>	Disallow
Pareora Catchment Society (Inc)	<p><b>PC7-108.15</b></p> <p><b>Topic: Stock Exclusion from waterways</b></p> <p><i>Amend stock exclusion provisions to exempt any enclosed stag or pig wallows which are provided for animal welfare purposes, and permanent exclusion for horse being ridden through or across a riverbed for legitimate and lawful farming purposes and all farmed grazing animals when being mustered or moved where there are no alternatives to river crossings.</i></p>	<p>NZPork supports the exemption of enclosed wallows from stock exclusion provisions. Wallows provide a welfare function on farms, assisting pigs in thermoregulation and parasite control, as well as allowing animals to participate in natural social behaviours. Good Management Practice for outdoor piggeries prevents runoff from wallows entering a waterway.</p>	Allow

Royal Forest & Bird Protection Society Inc.	<p><b>PC7-472.164</b></p> <p><b>Topic: 14.06.04 Table 14(zc)</b></p> <p><i>Amend the required reductions in Table 14(zc) so that they go further and faster to reflect the needs of the water and a genuine intent to address the water crisis</i></p>	<p>NZPork opposes unreasonable and unachievable N reduction targets and timeframes. NZPork supports the setting of N limits and a staged approach to reduction of estimated N discharge from farming activities, provided that these are backed by robust scientific evidence and have adequately accounted for the likely economic and social effects of compliance. For the successful implementation of N-loss reductions, landowners must have the ability to adjust farming practice while maintaining farm viability. Shortening timeframes or increasing targets for reducing N losses does not account for the likely significant socio-economic effects of doing so, or allow for the use of sufficient time to mitigate those effects</p>	Disallow
Royal Forest & Bird Protection Society Inc.	<p><b>PC7-472.213</b></p> <p><b>Topic: 16.07</b></p> <p><i>Amend Schedule 7 to insert the requirement to identify any areas of indigenous biodiversity including flora, fauna and ecological communities that are not listed as significant but are likely to meet the CRPS significance criteria.</i></p>	<p>NZPork oppose the extension of the farm environment plan regime beyond those requirements specified in Schedule 7.</p>	Disallow
Royal Forest & Bird Protection Society Inc.	<p><b>PC7-472.214</b></p> <p><b>Topic: 16.07</b></p> <p><i>Amend Schedule 7 to insert the requirement to identify whether the farm is located within an outstanding landscape or has outstanding natural features including but not limited to ecological, archaeological, or geological features</i></p>	<p>NZPork oppose the extension of the farm environment plan regime beyond those requirements specified in Schedule 7.</p>	Disallow

**Add further pages as required – please initial any additional pages.**