



Federated Farmers of New Zealand

Further submission on Proposed Waikato Regional Plan Change 1 and Variation 1 Waikato and Waipa River Catchments

17 September 2018



**FURTHER SUBMISSION TO WAIKATO REGIONAL COUNCIL ON PROPOSED WAIKATO
REGIONAL PLAN CHANGE 1 AND VARIATION 1 WAIKATO AND WAIPA RIVER
CATCHMENTS**

Form 6

Further submission in support of, or in opposition to, submission on notified proposed plan change
and plan variation

Clause 8 of Schedule 1, Resource Management Act 1991

To: The Chief Executive
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This is a further submission in support of or in opposition to a submission on a change and variation to Proposed Waikato Regional Plan Change 1 (“**PC 1**”) and Variation 1 (“**Variation 1**”) Waikato and Waipa River Catchments.

1. FFNZ is a person representing a relevant aspect of public interest, including for the reasons set out under headings 1 and 2 on the following pages.
2. FFNZ is a person who has an interest in the proposal that is greater than the interest the general public has, including for the reasons set out in headings 1 and 2 in the following pages.
3. FFNZ could not gain an advantage in trade competition through this further submission.
4. FFNZ wishes to be heard in support of its submissions and further submission.

Due to the size of FFNZ’s further submissions, this document has been separated into four volumes. In each volume, the first three sections are repeated. Section 4 (the specific comments) are different in each volume as follows:

- a. Volume 1 – Objectives
- b. Volume 2 – Policies

- c. Volume 3 – Methods and Rules
- d. Volume 4 – Schedules, Glossary of Terms and consequential amendments

1. INTRODUCTION

- 1.1 FFNZ welcomes the opportunity to provide further submissions on Plan Change 1 and Variation 1.
- 1.2 As identified in its primary submissions, FFNZ represents a variety of dairy, dry stock, arable crops and horticulture land users in the Waikato region. FFNZ is a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses. FFNZ is a pan sector organisation that works with farmers to ensure practical and workable outcomes.
- 1.3 FFNZ aims to add value to its members' farming businesses. Its key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
 - a. FFNZ's members may operate their business in a fair and flexible commercial environment;
 - b. FFNZ's members, their families and their staff have access to services essential to the needs of the rural community; and
 - c. FFNZ's members adopt responsible management and environmental practices
- 1.4 FFNZ represents members who are engaged in a wide range of land use activities in the Waikato and Waipa River Catchment. This includes dairy farms, a range of drystock activities (including sheep and beef for meat and wool, cattle grazing for dairy support and deer for meat and velvet), horticulture activities (from commercial vegetable growing to cropping to orchards), a mixture of dairy, dry stock and horticulture and intensive farming activities like pig farming.
- 1.5 Both in the lead up to and following FFNZ's submissions on Plan Change 1 and Variation 1, FFNZ has undertaken extensive consultation with its members. This has included public meetings, member advisories, newspaper articles, discussion groups, one on one meetings, meetings with stakeholders, and projects with individual farmers to understand the implications of Plan Change 1 and Variation 1.
- 1.6 FFNZ has also undertaken extensive consultation with a range of farming and community interest groups, as well as territorial authorities and businesses that rely on the rural economy. As the largest pan sector organisation representing farming interests, FFNZ has attempted to find a middle ground position that attempts to balance the competing interests.

2. IMPORTANCE OF FARMING AND HORTICULTURE

- 2.1 Farming, horticulture and primary production activities are important for the social, economic and cultural wellbeing of people and communities in the Waikato region.
- 2.2 The economic importance of the agriculture sector to New Zealand's economy is well recognised. Its direct and indirect contribution to New Zealand's economy is about 15%.
- 2.3 As a broad indicator, Infometrics 2012 identified the agriculture, forestry and fishing industry as contributing the greatest proportion of the Waikato region's GDP (15.9%) and employing 22,090 followed closely by manufacturing (15.6%) which is estimated to have employed 20,513 in 2012. Notably, the Waikato region accounts for about a third of New Zealand's dairy production. Any regional plan provision which affects farm and horticulture business has the potential to also impact, positively or negatively, on regional and national economies.
- 2.4 Agriculture does not just bring economic benefits to the district, it also contributes to the wellbeing of communities and culture of the district. Farming is the fabric that keeps rural communities together.
- 2.5 Farming is such a large part of New Zealand's culture that a lot of depictions of the 'typical' New Zealander involve farming. For example, we are proud of their 'number 8 wire' mentality – referring to a type of fencing wire used on farms that we will use to solve any problem.

3. GENERAL COMMENTS

- 3.1 The further submission process has been an opportunity for parties to understand each other's position and to provide clarity as to their own position. FFNZ has taken the opportunity to understand the submissions of all parties and has attempted to clarify its position. FFNZ has focused primarily on submissions on Plan Change 1 because it provided a comprehensive and detailed submission on Variation 1 and the majority of submissions on Variation 1 were to either largely confirm relief sought on Plan Change 1 or to propose amendments that were similar to many of the amendments FFNZ proposed in its submission on Variation 1.
- 3.2 FFNZ observes that there is overwhelming opposition to Plan Change 1 with the majority of submitters expressing concerns about the implications for economic, social and cultural wellbeing. There are a range of options proposed for how Plan Change 1 ought to be amended to address these but the key theme appears to be flexibility and the ability to increase nitrogen (and potentially other contaminants), in appropriate circumstances.
- 3.3 The key alternatives proposed by other parties appear to be:
 - a. Adopting an approach based on land use capability ("LUC"), natural capital, land use suitability ("LUS") and/or some other measure of productivity or soil capability.
 - b. Adopting Best Practicable Option ("BPO") for diffuse discharges. Some submitters have proposed that this is on the basis of input controls.

- c. Providing greater flexibility for low nitrogen discharges to increase e.g. allow them to increase up to 20kgN.
 - d. Establishing catchment collectives and allocating nitrogen and other contaminants to them to manage among their members.
 - e. Deleting the Nitrogen Reference Point (“NRP”) and 75th percentile and/or determining the 75th percentile based on sub-catchments or some scale other than the Freshwater Management Units (“FMU”).
 - f. Amending the stock exclusion rules (e.g. to base them on slope, stock units or break feeding) or removing them and considering through tailored actions in Farm Environment Plans (“FEPs”).
- 3.4 FFNZ’s position in respect of these, and all proposals made in the submissions (as articulated in the summary of submissions), is set out in the tables contained in section 4 of this further submission. In summary, FFNZ opposes most of these proposals and considers that the framework proposed in its submission on Variation 1 (through track changes to PC1), and as described on pages 14 to 18 of its submission on Variation 1, is a more appropriate framework that will more reasonably achieve sustainable management.
- 3.5 While there are some similarities between parts of many other submitter’s proposals and FFNZ’s proposal, FFNZ considers that its proposed framework deals with the concerns in a more robust and comprehensive way that seeks to provide for all sectors. Importantly, FFNZ considers that its proposal addresses economic, social and cultural wellbeing in a way that is consistent.
- 3.6 As explained in FFNZ’s submission on Variation 1 (pages 10 to 13), FFNZ has attempted to create a policy and rule framework that is effects based, equitable and consistent (noting that this does not require the “same” outcome but it does require a similar approach). This has included consistency in approach between lakes and rivers; urban and rural, point source and diffuse discharges; effects based not ownership approach; consistency in approach across all farming activities and all contaminants.
- 3.7 There are a limited number of submitters who have proposed amendments to make the timeframes in Plan Change 1 shorter or to make targets more stringent or to make greater progress towards the 80 year targets in a shorter timeframe. FFNZ’s key concern is that these submitters do not appear to have considered the economic, social and cultural costs nor have they considered what is technically feasible on the basis of available technology. FFNZ strongly opposes proposals to make Plan Change 1 more stringent.
- 3.8 In most parts of this further submission, FFNZ’s views are contingent on other changes being made as proposed in FFNZ’s submission on Variation 1. In this sense, FFNZ’s submission on Variation 1 needs to be seen as a package and FFNZ’s view on particular provision cannot (and should not) be viewed in isolation.
- 3.9 By way of example, FFNZ’s views on the NRP are contingent on the “package.” As explained in the detailed comments, FFNZ supports the NRP as long as it is not used as an allocation tool or to benchmark nitrogen. FFNZ supports the NRP being used as a reference

point to provide information regarding current discharges. However, FFNZ's view on the NRP needs to be viewed in the context of the various other changes it proposes to the objectives, policies, methods, rules and schedules.

- 3.10 By way of example (this is not an exhaustive list), FFNZ proposes changes to the permitted activity rules such that low nitrogen discharge activities could increase to 15kgN (or some other appropriate permitted baseline) as a permitted activity. FFNZ proposes changes to the policies (such as policy 6) to support applications to increase nitrogen in appropriate circumstances (e.g. Most Practicable Action ("MPA") framework). FFNZ proposes changes to Schedule B to provide for recognition of mitigations outside of Overseer, the use of models other than Overseer and alternatives to standards or missing data.
- 3.11 Finally, there were a very large number of submissions on Plan Change 1 and Variation 1, and the summary of submissions was equally large. This further submission has ended up comprising four very large documents and has taken considerable time to draft. In these circumstances, it is inevitable that there are likely to be some errors or omissions. FFNZ apologises if any comment in this document causes any offence to any party (none is intended). FFNZ welcomes and looks forward to further discussion with Council and the parties prior to the hearing.

4. SPECIFIC COMMENTS

- 4.1 The table on the following pages sets out the particulars of the original submitter and submission number, the provision to which their submission point relates, the relief they seek, whether FFNZ supports or opposes the submission (in whole or in part), and the reasons for FFNZ's position.
- 4.2 In terms of decisions sought, FFNZ seeks that the submission points are allowed to the extent that they are supported in this further submission and that they are disallowed to the extent that they are opposed in this further submission.
- 4.3 FFNZ also seeks any consequential changes necessary to give effect to the relief sought or to address the concerns raised in this further submission.

5. FURTHER SUBMISSION SPECIFICS – VOLUME 1 OF 4

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
3.11.2 Objectives					
Aldridge, Roderick Francis David Submitter ID: 73788	PC1-7873	3.11.2 Objectives	AMEND 3.11.2 Objectives so they are defined in terms of requirements for a healthy ecosystem. Where this cannot be defined, PPC1 should use criteria which include measures such as: Natural Character, Dissolved Oxygen, Macroinvertebrate Community Index, Cyanobacteria, Temperature, toxic heavy metals, deposited and suspended sediment and barriers to fish migration. [For the full list of suggested criteria refer to submission].	Oppose	FFNZ is concerned that the 80 year targets are flawed (including on the basis of the assumptions) and will impose significant cost for no net benefit. FFNZ does not support the addition of additional criteria or more stringent standards.
Aston, Lucy Submitter ID: 73020	PC1-6996	3.11.2 Objectives	AMEND PPC1 so there is a 20 to 30 year approach with clearly established up front water quality targets.	Oppose	FFNZ is concerned that the 80 year targets are flawed (including on the basis of the assumptions) and will impose significant cost for no net benefit. FFNZ is concerned that adopting a 20-30 year approach will impose even higher standards and result in even more flaws in the identification of targets.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10790	3.11.2 Objectives	ADD a NEW Objective to read: " <u>New Objective: Restoration and protection of ecosystem health</u> <u>Ecosystem health is achieved in Waikato rivers, lakes and wetlands within 80 years as a result of staged reductions in point and non-point source discharges.</u> " AND ADD a NEW Objective to read: " <u>New Objective: Classification,</u>	Support in part Oppose in part	FFNZ agrees that both diffuse and point source discharges ought to be subject tot the targets. However, FFNZ is concerned that the 80 year targets are flawed (including on the basis of the assumptions) and will impose significant cost for no net benefit. FFNZ considers that there is no scope to include wetlands as proposed and is concerned that the

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			<u>Maintenance and Enhancement of Significant Wetlands</u> <u>a) All wetlands within the Waikato and Waipā catchments are assessed and added to Table 3.7.7 of the parent plan.</u> <u>b) Wetlands within the Waikato and Waipā catchments are maintained or enhanced to protect their ecosystems, including hydrological functioning and extent."</u>		proposal will impose significant cost for no net benefit.
Bailey, James Submitter ID: 73926	PC1-4790	3.11.2 Objectives	ADD NEW objectives, policies, methods and rules that ensure the sub-catchment approach to improving water quality is enabled and incentivised through the development of sub-catchment governance groups that will help the Council identify edge of field mitigations to help provide solutions to specific sub-catchment water quality issues AND AMEND to enable group/global consents to be granted at a sub-catchment level for sub-catchments to work together in meeting the bottom line water quality targets at sub-catchment level AND AMEND to acknowledge the importance of water quality monitoring at sub-catchment level by including the attributes total nitrogen and total phosphorous at the sub-catchment level AND DELETE approaches in PPC1 which hold land use to historic	Support in part Oppose in part	FFNZ supports a tailored and proportionate sub-catchment approach. However, it has concerns about an approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ's concerns include that this may devolve power to a particular group, may not result in water quality improvements and may impose significant cost. FFNZ supports coordinated edge of field, multiple property and/or whole of sub-catchment actions. FFNZ does not support the adoption of TN and TP targets for every sub-catchment if they are based on the lake metric. As set out in its submission on Variation 1, FFNZ has significant concerns that this metric is too stringent and not appropriate and will impose significant cost for no net benefit. FFNZ does not support allocation. It only supports the NRP as long as it is used as a reference point and not as grand parenting. FFNZ does not support allocation on the basis of LUC for reasons including

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			discharge rates based on historic use AND REPLACE with allocation based on the natural capital of soils which underpins land use suitability and ensures equitable outcomes.		that LUC is not a proxy for nitrogen and there is no reliable or equitable way of allocating.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11150	3.11.2 Objectives	<p>AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which establish Freshwater Objectives based on the values of freshwater including cultural, recreational, and ecological values, along with consumptive values (ability to assimilate pollution, food production, and forestry).</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which change Table 3.11-1 numerical water quality targets to Freshwater Objectives as appropriate (i.e. chlorophyll a, clarity, E.coli), and remove these parameters from Table 3.11-1 and instead hold as numerical freshwater Objectives.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required new Objectives which recognise and provide for the establishment and operation of collaborative sub-catchment groups, both through regulatory and non-regulatory methods, in sustainably managing water quality and biodiversity issues facing a catchment, providing innovative and where required edge of field mitigation and which facilitates</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>While FFNZ agrees that the values ought to be better reflected in the provisions of PC1, it is not able to form a view (and therefore cannot support) the proposal to include them in objectives because it is not clear how they would be weighed and evaluated.</p> <p>FFNZ does not support the 80 year targets for reasons including that they are based on flawed assumptions and will result in significant cost with no net benefit, and for this reason does not support new objectives with numeric water quality targets as numeric objectives.</p> <p>FFNZ supports the establishment of sub-catchment groups but considers this needs to be non-regulatory (and not compulsory) and considers that this should not involve the devolution of power or allocation of contaminants to sub-catchments.</p> <p>FFNZ does not support the inclusion of biodiversity and considers FFNZ should focus on water quality and contaminants.</p> <p>FFNZ does not support nitrogen allocation and does not consider that this will ensure resource use is efficient. FFNZ considers that nitrogen can be managed without allocation and that allocation will not result in an efficient outcome but it will impose significant cost for no net benefit.</p>

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			<p>flexible, viable businesses and communities, and enables sustainable management of resources such as nutrients within the assimilative capacity of soils and water, to achieve the Vision and Strategy for the Waikato River.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure resource use is efficient including through establishment of nitrogen allocation frameworks if nitrogen is required to be allocated.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure that resource use takes into account the natural capital of soils including the natural productive potential of soils (for example Land Use Capability), climate, geology, and assimilative capacity of water.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which provide for the economic and social well-being of people and communities, people and community resilience, adaptive management, and sub-catchment approaches lead by communities.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure that limits and targets are set appropriately and enable the economic and social well-being of</p>		<p>FFNZ does not support an allocation approach based on natural capital for reasons including that there is no reasonable proxy for nitrogen and such an approach would result in significant cost, uncertainty and inequity.</p> <p>FFNZ agrees that the objectives ought to recognise economic and social wellbeing and include resilience and adaptive management (provided this is not based on a precautionary approach and results in changes being made as more information becomes available as opposed to adopting a more stringent approach until more information is available).</p> <p>FFNZ supports an approach that is tailored to each sub-catchment. It also supports an approach that provides certainty.</p> <p>FFNZ supports an approach that clearly defines the various terminology in the NPS-FM (e.g. attributes, limits, objectives etc) but it does not support the 80 year targets or an approach that would result in more stringent rules than what is proposed in PC1.</p>

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			<p>people and communities and ensure that they are resilient, vibrant, and future proofed.</p> <p>AND AMEND PPC1 so that it adopts and truly encourages and empowers a sub-catchment approach to managing land use and water quality, tailored to the specific issues faced by the sub-catchment , and with appropriate time frames for achievement of its interim targets and long term Objectives.</p> <p>AND AMEND PPC1 to provide communities and individuals with certainty in relation to what will be required of them to enable sound business, succession, and investment decisions to be made, including investment into environmental mitigation.</p> <p>AND AMEND Objective 4 OR ADD a NEW Objective to give effect to the following intent:</p> <p><u>"People and community resilience / Te Whaingā 4: Te manawa piharau o te tangata me te hapori, and the achievement of the Vision and Strategy for the Waikato River. Communities working together to sustainably manage land and water resources within their sub-catchments, to protect the values for freshwater, to maintain and where degraded improve water quality, and</u></p>		

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			<p><u>to protect and restore biodiversity, for generations to come."</u> AND AMEND Table 3.11-1 and PPC1 Objectives to make a clear distinction between what are Freshwater Objectives, Attributes, limits and targets. Freshwater Objectives would include values of freshwater such as cultural, ecological, primary production, commercial, and recreational and may include numerical parameters for periphyton, chlorophyll a, macroinvertebrate community indices (MCI) and sediment and clarity.</p>		
Department of Conservation Submitter ID: 71759	PC1-10521	3.11.2 Objectives	AMEND PPC1 to clearly identify freshwater objectives that recognise and provide for intrinsic values for each Freshwater Management Unit. AND AMEND PPC1 objectives so that they reflect a robust analysis under section 32 of the Resource Management Act. AND ADD a NEW objective which safeguards ecosystem health and the health of indigenous species. AND ADD a NEW objective that recognises and provides for the values of freshwater fish species identified in Appendix C of the submission [See submission]. AND ADD a NEW objective relating to Whangamarino Wetland, and the significant values of all wetlands that achieves the following:	Oppose	FFNZ has concerns that the FMUs may not be the appropriate scale for managing freshwater and is concerned that requiring intrinsic values for each FMU may result in a more stringent approach and impose significant cost for no net benefit. FFNZ does not consider it necessary or appropriate to adopt new objectives for ecosystem health, fish species etc. FFNZ considers that there is no need for a new objective for Whangamarino Wetland and considers it is provided for in the objective as amended in FFNZ's submission on Variation 1. FFNZ is concerned that a proposal to recognise the significant values of all wetlands will result in uncertainty (including in determining what is a wetland) and impose significant cost for no net benefit.

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			<ul style="list-style-type: none"> recognises the values and significance of the Whangamarino as a whole wetland system, comprising marsh, swamp, fen and bog wetland types. gives effect to the National Policy Statement Freshwater Management in recognising and protecting the significant wetlands and overall quality of freshwater is improved. <p>AND ADD a NEW objective which recognises the significant values of all wetlands. AND ADD a NEW objective which recognises that all sediments and nutrients in the region ultimately accumulate in the Waikato Estuary, and which seeks restoration of healthy ecosystems from the mountains to the sea, including in estuaries.</p>		<p>FFNZ is concerned about the potential costs of providing a new objective for Waikato Estuary and it is not clear the environmental effects.</p>
Downie, Janna Submitter ID: 71903	PC1-10137	3.11.2 Objectives	<p>AMEND PPC1 to provide more precise freshwater objectives AND AMEND PPC1 so that a greater range of freshwater attributes are managed: Te Hauora o te Taiao; natural character; dissolved oxygen (DO); deposited and suspended sediment; Freshwater Macroinvertebrate Health (Macroinvertebrate Community</p>	Oppose in part	<p>FFNZ has concerns about the 80 year targets (including the underlying assumptions) and is concerned that providing more precise freshwater objectives would result in the same issues.</p> <p>FFNZ does not support management of a greater range of attributes or adoption of in stream limits because it considers that the attributes are already too stringent, it would impose significant cost and there would be no net benefit.</p>

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			<p>Index); periphyton; cyanobacteria; benthic cyanobacteria; temperature; pH; toxic heavy metals; barriers to fish migrations; and water flows and levels; and Dissolved Inorganic Nitrogen (DIN); total nitrogen; and total phosphorous in the tributaries and sub-catchments AND ADD instream limits and associated targets for nitrogen loads, phosphorous loads, sediment loads, E.coli, toxic contaminant loads such as metals or organic compounds, micro-organisms and temperature AND ADD load thresholds in sub-catchments and catchments that are under resource use pressure AND ADD a freshwater implementation and program of change plan which includes: a) a transparent approach to developing monitoring, compliance, and implementation systems; b) steps to ensure that effective and cost-efficient monitoring, compliance and implementation capacity is in place at the time the regime is introduced; c) monitoring and reporting on and reviewing the implementation of the policy; d) transparent public information for freshwater discharges and takes; e) a Council report every two years on progress towards meeting objectives, limits and targets; and f) steps the Council will take if</p>		<p>FFNZ does not support load thresholds for sub-catchments for reasons including that it is concerned that that will result in allocation and FFNZ does not support allocation.</p> <p>FFNZ supports the adoption of a reasonable freshwater implementation plan.</p> <p>FFNZ supports FEPs as both a permitted and controlled activity because it considers that provides flexibility for farmers and can appropriately be managed either way.</p> <p>FFNZ does not support minimum standards that are too stringent or don't recognise particular circumstances. It supports a tailored approach to addressing critical source areas through FEPs.</p> <p>FFNZ does not support a polluter pays or pollution tax approach for reasons including that it would impose significant cost, there is no reliable way of measuring discharges and it will not result in net benefit.</p>

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			the combined interventions are not sufficient AND ADD Farm Environment Plans as a Controlled Activity AND AMEND so that contaminant allocations are based on Land Use Capability rather than on historic practice (grandparenting). AND ADD rules to prevent over fertilising, over stocking, over grazing, over watering and over draining AND ADD a polluter pays mechanism such as a pollution tax and use the revenue to both restore the water bodies and incentivise good land management practises.		
Farmers 4 Positive Change (F4PC) Submitter ID: 73355	PC1-10422	3.11.2 Objectives	ADD a NEW Objective which provides for people and community resilience, adaptive management, and sub-catchment approaches lead by communities.	Support in part	FFNZ supports a sub-catchment approach (provided it is not regulatory or involve allocation) and supports community resilience and adaptive management (provided this is not based on a precautionary approach and results in changes being made as more information becomes available as opposed to adopting a more stringent approach until more information is available).
Hamilton, Malibu Submitter ID: 74083	PC1-9855	3.11.2 Objectives	AMEND 3.11.2 Objectives following further consideration of which attributes need to have limits and targets to ensure ecosystem health, giving consideration to the following list: <ul style="list-style-type: none"> Natural character (including the condition of the riparian margin) Dissolved oxygen 	Oppose	FFNZ has concerns that the 80 year targets are flawed and will impose significant cost. FFNZ does not support the adoption of additional targets or objectives which are likely to have the same issues and compound the costs. FFNZ does not support the allocation of nutrient loads for reasons including that this will impose significant cost for no net benefit. FFNZ is also concerned about the likely significant implications of an approach that deems sub-catchments over

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			<ul style="list-style-type: none"> • Deposited and suspended sediment (the TLG recommended that water clarity was an appropriate defacto level) • Te Hauora o te Taiao/ the health and mauri of the environment • Freshwater macroinvertebrate health • Periphyton • Cyanobacteria • Benthic cyanobacteria • Dissolved inorganic nitrogen and total nitrogen in the tributaries/sub-catchments • Total phosphorus in the tributaries/sub-catchments • Temperature • pH • Toxic heavy metals, • Barriers to fish migrations, • Water flows and levels and estuaries. <p>AND AMEND PPC1 objectives to include limits for nutrient loads (nitrogen and phosphorus), sediment loads, E.coli, toxic contaminants loads (e.g metals, organic compounds), micro-organisms and temperature.</p> <p>AND AMEND to ensure that in over-allocated catchments (where the</p>		<p>allocated and attempts to claw back (including that there is no equitable or reliable way to do this).</p> <p>FFNZ does not support allocation of contaminants for reasons including that there is no equitable or reliable way of allocating. FFNZ considers that LUC is not a proxy for nitrogen and there is no reasonably proxy for nitrogen and LUC is not suitable for use, even on an interim basis.</p>

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			existing load exceeds the desired limit) the Waikato Regional Council should set both interim limits and targets (a limit to be met by a defined time in the future). Targets must be demonstrably set at levels that will allow freshwater objectives to be set. AND AMEND to ensure that once limits are set, pollutant loads to land should be identified on both a sub-catchment and farm level taking into account the assimilative capacity of the land and attenuation of the soil type. The Land Use Capability classification system should be part of this calculation until further research associated with a land suitability approach is complete or practicable to use.		
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5368	3.11.2 Objectives	ADD a NEW Objective to read: <u>"The management of discharges onto or into land or directly into water and land use activities affecting groundwater and surface water quality in a manner that:</u> a) <u>Safeguards the life supporting capacity of water and recognises and provides for the restoration and protection of the 80 year water quality attribute goals in Table 3.11-1, through the adoption of the best practicable option;</u> b) <u>Where a discharge is onto or into land, avoids, remedies or mitigates</u>	Oppose in part Support in part	FFNZ has concerns that the 80 year targets are flawed and will impose significant cost. Therefore it does not support their inclusion in an objective without substantive amendment to Table 3.11-1. FFNZ agrees that the well beings associated with the discharges needs to be recognised and provided for.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>adverse effects on surface water or groundwater.</u></p> <p><u>c) Recognises that discharges contribute to social and economic well-being and in some cases significant investment relies those discharges, including rural based activities such as agriculture, perishable food processing and industry;</u></p> <p><u>d) Recognises that new regionally significant industrial discharges contribute to social and economic well-being and may be appropriate where such activities increase the net efficiency of resource use or where changes to land use."</u></p>		
Lawson, John Submitter ID: 52942	PC1-11223	3.11.2 Objectives	<p>AMEND 3.11.2 Objectives by including the following parameters as freshwater objectives: Natural character including the condition of the riparian margin, dissolved oxygen, deposited and suspended sediment, Te Hauora o te Taiao/ the health and mauri of the environment, freshwater macroinvertebrate health, periphyton, cyanobacteria, benthic cyanobacteria, dissolved inorganic nitrogen and Total Nitrogen in the tributaries/sub-catchments, Total Phosphorus in the tributaries/sub-catchments, temperature and pH, toxic heavy metals, barriers to fish migrations, water flows and levels, and estuaries.</p>	Oppose	<p>FFNZ has concerns that the 80 year targets are flawed and will impose significant cost. FFNZ does not support the adoption of additional targets or objectives which are likely to have the same issues and compound the costs.</p> <p>FFNZ does not support the allocation of nutrient loads for reasons including that this will impose significant cost for no net benefit. FFNZ is also concerned about the likely significant implications of an approach that deems sub-catchments over allocated and attempts to claw back (including that there is no equitable or reliable way to do this).</p> <p>FFNZ does not support allocation of contaminants for reasons including that there is no equitable or reliable way of allocating. FFNZ considers that LUC is not a proxy for nitrogen and there is no</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND to include nutrient loads (nitrogen and phosphorus), sediment loads, E.coli, toxic contaminants loads, micro-organisms and temperature.</p> <p>AND AMEND to ensure that limits are set at levels that will allow freshwater objectives to be set</p> <p>AND AMEND to ensure that in over-allocated catchments (where the existing load exceeds the desired limit) the Waikato Regional Council should set both interim limits and targets (a limit to be met by a defined time in the future). Targets must be demonstrably set at levels that will allow freshwater objectives to be set</p> <p>AND AMEND to ensure timeframes are well defined and achievable</p> <p>AND AMEND to ensure that once limits are set, pollutant loads to land should be identified on both a sub-catchment and farm level taking into account the assimilative capacity of the land and attenuation of the soil type. The Land Use Capability classification system should be part of this calculation until further research associated with a land suitability approach is complete or practicable to use.</p>		<p>reasonably proxy for nitrogen and LUC is not suitable for use, even on an interim basis.</p>
<p>Maniapoto Maori Trust Board Submitter ID: 73730</p>	<p>PC1-9163</p>	<p>3.11.2 Objectives</p>	<p>ADD a NEW Objective to read: "<u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u></p>	<p>Oppose</p>	<p>FFNZ supports objective 6 as amended in its submission on variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u></p> <p>AND ADD Reasons for adopting Objective 6 to read: "<u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u>"</p>		FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.
Matamata-Piako District Council Submitter ID: 73419	PC1-3462	3.11.2 Objectives	AMEND to review and set realistic Objectives that acknowledge the intergenerational time period will likely be at least 80 years. This timeframe is conditional on the development of the supporting sciences, modelling and changing land management practices and their impacts on communities in the two catchments.	Support	FFNZ agrees that the objectives need to recognise that the 80 year targets are not currently achievable and entrenching them in objectives is risky and not helpful. FFNZ agrees that the objectives should be realistic.
Maungatautari Marae Submitter ID: 73990	PC1-11729	3.11.2 Objectives	<p>ADD a NEW Objective to read: "<u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u></p> <p><u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management</u></p>	Oppose	<p>FFNZ supports objective 6 as amended in its submission on variation 1.</p> <p>FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored,</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>Units to achieve the water quality attribute targets in Table 3.11-1.</u> AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "		proportionate and efficient approach for the improvement of water quality in the lakes.
McGovern, Annette Submitter ID: 72969	PC1-8311	3.11.2 Objectives	ADD a NEW Objective that provides a balanced approach to enabling rural land owners to provide for their economic well-being, and recognises the value of primary production to the Waikato community and national economy. AND ADD a NEW Objective OR AMEND existing objectives to recognise the lag effect on water quality of some contaminants from historical land uses.	Support in part Oppose in part	FFNZ agrees that the objectives need to balance primary production. FFNZ is concerned about how lag is reference and considers that it needs to recognise complex factors like attenuation and this is subject to a need for more science.
McLean, Parekawhia Submitter ID: 73359	PC1-11878	3.11.2 Objectives	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management</u>	Oppose	FFNZ supports objective 6 as amended in its submission on variation 1. FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>Units to achieve the water quality attribute targets in Table 3.11-1.</u> AND ADD Reasons for adopting Objective 6 to read: "<u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u>"</p>		
<p>Ngaati Tamaoho Trust Te Taiao Roopuu Submitter ID: 74088</p>	<p>PC1-11576</p>	<p>3.11.2 Objectives</p>	<p>ADD a NEW Objective to read: "<u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u>" AND ADD Reasons for adopting Objective 6 to read: "<u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes</u></p>	<p>Oppose</p>	<p>FFNZ supports objective 6 as amended in its submission on variation 1.</p> <p>FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>Freshwater Management Units over the next 10 years."</u>		
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11828	3.11.2 Objectives	ADD a NEW Objective to read: <u>"Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1."</u> AND ADD Reasons for adopting Objective 6 to read: <u>"Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years."</u>	Oppose	FFNZ supports objective 6 as amended in its submission on variation 1. FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6364	3.11.2 Objectives	ADD a NEW Objective as follows: <u>"The management of discharges onto or into land or directly into water and land use activities affecting groundwater and surface water quality in a manner that:</u> a) <u>Safeguards the life supporting capacity of water and recognises and provides for the restoration and protection of the 80 year water quality attribute goals- in Table 3-11.1,</u>	Support in part Oppose in part	FFNZ has concerns that the 80 year targets are flawed and will impose significant cost. FFNZ does not support referring to Table 3.11-1 unless the targets are amended. FFNZ supports an approach based on BPO but as defined by MPA (as set out in FFNZ's submission on Variation 1) and not as proposed by the submitter (which relies on input controls). FFNZ agrees that well beings for primary production and rural industry need to be balanced.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>through the adoption of the best practicable option;</u> <u>b) For discharges onto or into land, avoids, remedies or mitigates adverse effects on surface water of groundwater.</u> <u>c) Recognises that discharges contribute to social and economic well-being and in some cases significant investment relies on those discharges, including rural-based activities such as agriculture, perishable food processing and industry;</u> <u>d) Recognises that new regionally significant industrial discharges contribute to social and economic well-being and may be appropriate where such activities increase the net efficiency of resource use."</u> AND OR AMEND the Objectives to reflect numerical levels and targets which give effect to the National Policy Statement for Freshwater Management 2014. AND AMEND Table 3.11-1 and the Objective of PPC1 to ensure consistency with the National Policy Statement for Freshwater Management 2014.</p>		<p>FFNZ agrees that the numeric 80 year targets do not give effect to the NPS-FM.</p>
<p>Poohara Marae Submitter ID: 73545</p>	<p>PC1-12003</p>	<p>3.11.2 Objectives</p>	<p>ADD a NEW Objective to read: "<u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u></p>	<p>Oppose</p>	<p>FFNZ supports objective 6 as amended in its submission on variation 1.</p> <p>FFNZ is concerned that including lakes in the objectives in the way proposed will impose</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u></p> <p>AND ADD Reasons for adopting Objective 6 to read: "<u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u>"</p>		<p>significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.</p>
<p>Potini Whaanau Submitter ID: 74089</p>	<p>PC1-11678</p>	<p>3.11.2 Objectives</p>	<p>ADD a NEW Objective to read: "<u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u>"</p> <p>AND ADD Reasons for adopting Objective 6 to read: "<u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation</u></p>	<p>Oppose</p>	<p>FFNZ supports objective 6 as amended in its submission on variation 1.</p> <p>FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "		
Raukawa Charitable Trust Submitter ID: 74073	PC1-10548	3.11.2 Objectives	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> " AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "	Oppose	FFNZ supports objective 6 as amended in its submission on variation 1. FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.
South Waikato District Council Submitter ID: 72892	PC1-4029	3.11.2 Objectives	AMEND to set realistic Objectives that acknowledge the intergenerational time period will likely be at least 80 years.	Support	FFNZ has concerns that the 80 year targets are flawed and too ambitious and not achievable on the basis of current technology. It agrees that the time period needs to be extended and/or the targets revised.
Raukawa Charitable Trust	PC1-10548	3.11.2 Objectives	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine,</u>	Oppose	FFNZ supports objective 6 as amended in its submission on variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74073			<u>Volcanic and Peat Lakes Freshwater Management Units.</u> <u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1."</u> AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy.</u> <u>This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years."</u>		FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11777	3.11.2 Objectives	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u> <u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1."</u> AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of</u>	Oppose	FFNZ supports objective 6 as amended in its submission on variation 1. FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years."</u>		
Te Awamaarahi Marae Trustees Submitter ID: 74168	PC1-11958	3.11.2 Objectives	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> " AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years."</u>	Oppose	FFNZ supports objective 6 as amended in its submission on variation 1. FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.
Te Kauri Marae Submitter ID: 74124	PC1-11626	3.11.2 Objectives	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in</u>	Oppose	FFNZ supports objective 6 as amended in its submission on variation 1. FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored,

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> AND ADD Reasons for adopting Objective 6 to read: "<u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u>"</p>		<p>proportionate and efficient approach for the improvement of water quality in the lakes.</p>
<p>Te Runanga o Ngati Kea Ngati Tuara Trust Submitter ID: 73543</p>	<p>PC1-12235</p>	<p>3.11.2 Objectives</p>	<p>ADD a NEW Objective to read: "<u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u>" AND ADD Reasons for adopting Objective 6 to read: "<u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the</u></p>	<p>Oppose</p>	<p>FFNZ supports objective 6 as amended in its submission on variation 1.</p> <p>FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>management of activities in the Lakes Freshwater Management Units over the next 10 years."</u>		
Te Taniwha o Waikato Submitter ID: 73361	PC1-12053	3.11.2 Objectives	ADD a NEW Objective to read: <u>"Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1."</u> AND ADD Reasons for adopting Objective 6 to read: <u>"Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years."</u>	Oppose	FFNZ supports objective 6 as amended in its submission on variation 1. FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.
Te Whakakitenga o Waikato Incorporated (Waikato-Tainui) Submitter ID: 74105	PC1-7769	3.11.2 Objectives	ADD a NEW Objective to read: <u>"Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1."</u>	Oppose	FFNZ supports objective 6 as amended in its submission on variation 1. FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND ADD Reasons for adopting Objective 6 to read: "<u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u>"</p>		
<p>Turangawaewae Marae Submitter ID: 74173</p>	<p>PC1-12170</p>	<p>3.11.2 Objectives</p>	<p>ADD a NEW Objective to read: "<u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u>"</p> <p>AND ADD Reasons for adopting Objective 6 to read: "<u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u>"</p>	<p>Oppose</p>	<p>FFNZ supports objective 6 as amended in its submission on variation 1.</p> <p>FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10271	3.11.2 Objectives	ADD a NEW Objective to read: <u>"Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1."</u> AND ADD Reasons for adopting Objective 6 to read: <u>"Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years."</u>	Oppose	FFNZ supports objective 6 as amended in its submission on variation 1. FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.
van der Voorden, Vera and Nora Submitter ID: 74109	PC1-7449	3.11.2 Objectives	AMEND 3.11.2 Objectives by including the following parameters as freshwater objectives, natural character including the condition of the riparian margin, dissolved oxygen, deposited and suspended sediment, Te Hauora o te Taiao/ the health and mauri of the environment, freshwater macroinvertebrate health, periphyton, cyanobacteria, benthic cyanobacteria, dissolved inorganic nitrogen and Total Nitrogen in the tributaries/sub-catchments, Total	Oppose	FFNZ has concerns that the 80 year targets are flawed and will impose significant cost. FFNZ does not support the adoption of additional targets and considers that these will suffer the same flaws or compound them and cause more significant cost for no net benefit. FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable way to allocate. FFNZ does not support the use of LUC to allocate for reasons including that it is not a proxy for nitrogen and will result in significant cost and inequity.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Phosphorus in the tributaries/sub-catchments, temperature and pH, toxic heavy metals, barriers to fish migrations, water flows and levels, and estuaries</p> <p>AND AMEND to include nutrient loads (nitrogen and phosphorus), sediment loads, E-coli, toxic contaminants loads (e.g metals, organic compounds), micro-organisms and temperature.</p> <p>AND AMEND to ensure that limits are set at levels that will allow freshwater objectives to be set</p> <p>AND AMEND to ensure that in over-allocated catchments (where the existing load exceeds the desired limit) the Waikato Regional Council should set both interim limits and targets (a limit to be met by a defined time in the future). Targets must be demonstrably set at levels that will allow freshwater objectives to be set</p> <p>AND AMEND to ensure timeframes are well defined and achievable</p> <p>AND AMEND to ensure that once limits are set, pollutant loads to land should be identified on both a sub-catchment and farm level taking into account the assimilative capacity of the land and attenuation of the soil type. The Land Use Capability classification system should be part of this calculation until further research associated with a land</p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			suitability approach is complete or practicable to use.		
Waahi Pa Marae Committee Submitter ID: 73751	PC1-12114	3.11.2 Objectives	ADD a NEW Objective to read: <u>"Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1."</u> AND ADD Reasons for adopting Objective 6 to read: <u>"Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years."</u>	Oppose	FFNZ supports objective 6 as amended in its submission on variation 1. FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.
Waahi Whaanui Trust Submitter ID: 73537	PC1-11935	3.11.2 Objectives	ADD a NEW Objective to read: <u>"Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1."</u> AND ADD Reasons for adopting Objective 6 to read: <u>"Objective 6</u>	Oppose	FFNZ supports objective 6 as amended in its submission on variation 1. FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years."</u></p>		
<p>Waikato and Waipa River Iwi Submitter ID: 74035</p>	<p>PC1-3301</p>	<p>3.11.2 Objectives</p>	<p>ADD a NEW Objective to read: "<u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u>" AND ADD Reasons for adopting Objective 6 to read: "<u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years."</u></p>	<p>Oppose</p>	<p>FFNZ supports objective 6 as amended in its submission on variation 1.</p> <p>FFNZ is concerned that including lakes in the objectives in the way proposed will impose significant cost and not provide for a tailored, proportionate and efficient approach for the improvement of water quality in the lakes.</p>

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Waipapa Farms Ltd and Carlyle Holdings Ltd Submitter ID: 73863	PC1-4689	3.11.2 Objectives	ADD a NEW Objective that provides a balanced approach to enable rural land owners to provide for their economic well-being, and recognise the value of primary production activities. AND ADD a NEW Objective OR AMEND existing objectives to recognise the historical land uses and the effect of some contaminants discharged from land have a lag period.	Support in part Oppose in part	FFNZ agrees that the objectives need to balance primary production. FFNZ is concerned about how lag is reference and considers that it needs to recognise complex factors like attenuation and this is subject to a need for more science.
Wallace, Martin Lindsay Submitter ID: 72975	PC1-8322	3.11.2 Objectives	ADD a NEW Objective that requires property level allocation of discharges, prescribing that grandparenting or similar allocation methods will not be used, that fairly relates to the assimilative capacity of the land, water and their attributes, and not to historical practice.	Oppose	FFNZ does not support the allocation of contaminants for reasons including that there is no reliable or equitable way of allocating. FFNZ supports the NRP as long as it is used as a reference point and not to allocate nitrogen.
Watercare Services Ltd Submitter ID: 74077	PC1-8450	3.11.2 Objectives	AMEND PPC1 objectives and policies so they are RMA statutory plan objectives and policies and reflect best practice RMA plan drafting. AND AMEND the objectives and policies to clearly identify the objectives and policies that apply to farming activities and those that apply to municipal discharges.	Support in part	FFNZ agrees that the objectives and policies need to meet the requirements in the RMA. FFNZ considers that a consistent approach ought to be adopted for rural and urban discharges and considers that this can be dealt with in the same objectives and policies.
Advisory Committee on	PC1-9500	Objective 1	AMEND Objective 1 to make PPC1's timeframe 50 years with a short term target of 20% reduction in emissions.	Oppose	FFNZ opposes both the submission points on reduction in overall timeframe and an increase in short term targets of reductions.

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Regional Environment (ACRE) Submitter ID: 72441					<p>FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years (never mind shortening the overall time frame) when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others. Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>FFNZ struggles with the logic of the submitter that because the short term targets cannot technically be achieved they should be made even more challenging. FFNZ considers and submits that it is a reason to ease the short term targets to an achievable level rather than make the targets more challenging.</p> <p>Accordingly, FFNZ seeks that this submission points are disallowed.</p>
Aitken, David John Submitter ID: 71238	PC1-727	Objective 1 (Schedule C)	AMEND Schedule C to ensure stock exclusion is staged in order to be affordable, practical and sustainable. (Objective 1)	Support	<p>FFNZ agrees that Schedule C could be amended to ensure stock exclusion is affordable, practical and sustainable. FFNZ recommends improvements to Schedule C which are broadly:</p> <ul style="list-style-type: none"> - Linking the stock exclusion with stock units (18 or more per hectare);

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					<ul style="list-style-type: none"> - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue. <p>FFNZ considers that this aligns with making stock exclusion more affordable, practicable and sustainable and accordingly seeks that this submission point is allowed.</p>
Alcock and Easton, Jo and John Submitter ID: 73374	PC1-9214	Objective 1 (Table 3.11-1)	<p>RETAIN Objective 1 AND AMEND to ensure the water quality targets in Table 3.11-1 are achievable</p> <p>AND AMEND to ensure that full achievement of Objective 1 and Table 3.11-1 does not result in underachievement of the objectives relating to social, cultural and economic health and well-being of people and communities.</p>	Support in part	<p>FFNZ agrees that targets set in PC1 and Variation 1 should be set at a level that is achievable. Accordingly, FFNZ seeks that this first part of the submission point is allowed.</p> <p>FFNZ is not sure what is meant by the second part of the submission point. To the extent that it aligns with FFNZ's submissions on Plan Change 1 and Variation 1, it supports it. However, to the extent that it is inconsistent with that submission and/or results in more stringent targets or objectives being imposed on farmers, FFNZ does not support it.</p>
Allan, Eric Submitter ID: 73438	PC1-6109	Objective 1 (Table 3.11-1)	<p>AMEND Objective 1 so that it addresses the imbalance between achieving the Table 3.11-1 water quality targets and providing for economic and community well-being.</p> <p>AND AMEND PPC1 to strengthen the requirements to provide for economic well-being, including vibrancy and resilience of farming within the region and certainty for the future.</p>	Support	<p>The submitter's concerns appear to be that the effects on economic and community wellbeing has not been appropriately considered when setting the numeric attribute states. If this is correct, FFNZ shares these concerns and seeks that the relief sought is allowed.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Aston, Lucy Submitter ID: 73020	PC1-6992	Objective 1 (Table 3.11-1)	<p>AMEND Objective 1 to include discharges from other point sources of pollution including urban discharges.</p> <p>AND AMEND Table 3.11-1 so the water quality targets are achievable and that farmers and communities remain prosperous currently as well as during the 80 year period.</p> <p>AND AMEND Table 3.11-1 so the numerical targets do not apply during flood events.</p>	Support in part	<p>FFNZ agrees that there is no consistency in the approach between urban and rural; point source and diffuse discharge. FFNZ is not suggesting that the exact same provisions are adopted for all discharges but is seeking changes so that diffuse and point source discharges are treated equally and proportionally. FFNZ considers that it is not necessary to specifically include the words “point source discharges” in Objective 1 because it is implicit in the use of the word “discharges” without qualification. However, FFNZ would support further clarity on this if there is ambiguity or if parties (including WRC and point source dischargers) have interpreted Objective 1 as solely applying to point source discharges.</p> <p>FFNZ agrees that Table 3.11-1 ought to be amended so that the water quality targets are achievable and farmers and communities remain prosperous. In FFNZ’s submission it seeks a narrative approach to 80 year targets as opposed to hard wiring numeric targets now. However, it would also support alternative 80 year targets that appropriately provided for farmer and community prosperity, as well as changes in technology, information and science.</p> <p>FFNZ shares the submitter’s concern that the numeric attribute states do not take into account or provide for anomalies or spikes e.g. flood or other unforeseeable events that is not a trend. FFNZ agrees that the numeric targets ought to be amended to reasonably provide for this.</p>

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Aston, Penelope Submitter ID: 73811	PC1-5301	Objective 1	AMEND Objective 1 to include discharges from other point sources of pollution including urban discharges. AND AMEND time frame of plan to 20-30 years, with clearly established science based interim targets and bottom lines for water quality established up front.	Support in part Oppose in part	<p>FFNZ agrees that there is no consistency in the approach between urban and rural; point source and diffuse discharge. FFNZ is not suggesting that the exact same provisions are adopted for all discharges but is seeking changes so that diffuse and point source discharges are treated equally and proportionally. FFNZ considers that it is not necessary to specifically include the words “point source discharges” in Objective 1 because it is implicit in the sue of the word “discharges” without qualification. However, FFNZ would support further clarity on this if there is ambiguity or if parties (including WRC and point source dischargers) have interpreted Objective 1 as solely applying to point source discharges.</p> <p>FFNZ shares the submitter’s concerns with the basis for the long term targets and analysis in PC 1 and Variation 1 which did not seem to take into account hydro dams and townships and the other matters mentioned in the submitter’s submission point on Objective 1.</p> <p>FFNZ also agree that targets should be science based and be viable and provide certainty for farmers.</p> <p>FFNZ did not understand the submitter’s submission point about reducing the 80 year time frame of the plan to 20-30 years. After reading the submission in full, FFNZ’s understanding is that the submitter was critical of the 80 year time frame and its achievability (which FFNZ shares) and the submitter seeks a science based achievable approach (which FFNZ</p>

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					<p>supports) which gives certainty for farmers (which FFNZ supports) in the next 20-30 years (as opposed to adopting more stringent 20-30 year targets).</p> <p>However, because of the gaps in science and technology FFNZ considers current achievable targets for 20-30 years are not plausible and FFNZ recommends 10 year short term targets (to provide a metric against which to measure progress in the first 10 years and to provide for the significant information gathering and improved understanding that is likely to happen in the next 10 years) and other medium term targets that can be considered in future plan changes and which could progressively be amended at each stage as information and knowledge grows to reach the long term aim of the Vision and Strategy.</p> <p>For clarity, FFNZ does not support the submission point about adopting 20-30 targets as summarised.</p>
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6090	Objective 1	Objective 1: CONSIDER reviewing and making amendments to the Section 32 evaluation of the scenarios considered for PPC1 AND AMEND PPC1 as a consequence of the review AND MAKE any consequential amendments to Table 3.11-1 AND CONSIDER granting relief sought regarding land use flexibility, including land use change and offset mitigation opportunities.	Support in part	<p>FFNZ supports a fuller analysis of options in the section 32 evaluation. FFNZ also has concerns with the basis and accuracy of the long term targets and the methodology used by CSG to pursue Scenario 1. FFNZ opposes the 80 year targets on the basis of the assumptions that underpin them and does not support 80 year numeric targets.</p> <p>FFNZ considers that if there was a more appropriate way of calculating 80 year targets or attribute states that addressed its concerns, it would support these. Notwithstanding its first preference of deleting numeric 80 year targets, FFNZ would support the</p>

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					<p>proposal for a review of the targets as a result of consideration of alternative scenarios.</p> <p>FFNZ also has concerns about the rigid and inflexible approach in PC1 and Variation 1 to land use changes which FFNZ proposes to temper by amendments to Policy 6 as set out in its submissions to Variation 1 and by providing for land use change as a discretionary activity. FFNZ supports the consideration of offset mitigation opportunities and proposes amendments to Policy 11 in its submission on Variation 1 to provide for that.</p>
<p>Auckland/Waikato Fish and Game Submitter ID: 74085</p>	<p>PC1-10806</p>	<p>Objective 1 (Tables 3.11-1 and 3.11-2)</p>	<p>AMEND Table 3.11-1 so that 80 year attributes and targets are consistent with ecosystem health measures and achieving healthy freshwater ecosystems AND AMEND to include a range of attribute targets for all sites and sub-catchments that provide a clear linkage and assessment and measurement chain from the desired freshwater outcome to required reductions in nutrient loss from land by way of an allocation system AND AMEND to include appropriate sites for every sub-catchment AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2 AND AMEND Table 3.11-1 to add missing targets and limits, including</p>	<p>Oppose</p>	<p>FFNZ opposes all of the amendments proposed by the submitter to Tables 3.11-1 and 3.11-2.</p> <p>FFNZ considers that the numeric water quality attributes in the proposed Table 3.11-1 in PC1 and Variation 1 contain errors and/or are flawed due to, amongst other things (see FFNZ's submission on Variation 1), errors in the underlying assumptions, errors in the basis of analysis and there is a gap in understanding, knowledge, and information.</p> <p>Accordingly, FFNZ does not support the adoption of 80 year numeric targets (in Table 3.11-1) and instead supports the adoption of a narrative approach that focuses on progress towards achieving the water quality outcomes anticipated by the Vision & Strategy and the values by 2096.</p> <p>Although the same concerns relate to short term targets, FFNZ considers that they provide a</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			ecosystem health based limits and targets AND AMEND Table 3.11-1 to adopt the relief sought in Appendix 1 of the submission (pages 66 to 69).		metric against which to measure progress (although if there was a more reliable and appropriate means of calculating the short term targets FFNZ would support that). FFNZ opposes the submitter's range of amendments to table 3.11-1 as it is not practical, realistic or achievable. FFNZ also submits that ecosystem health is not the only value that needs to be considered when setting the attribute targets in Table 3.11.1. FFNZ seeks that this submission point is disallowed.
Bailey, James Submitter ID: 73926	PC1-4782	Objective 1 (Table 3.11-1)	AMEND Table 3.11-1 to give effect to the Vision and Strategy including all 13 of its objectives with endorsement from all five river iwi AND AMEND PPC1 to give effect to the National Policy Statement for Freshwater Management AND AMEND to provide for healthy and vibrant communities AND AMEND to give effect to water quality outcomes that are actually achievable AND AMEND to assess the E.coli / pathogen relationship and provide a more realistic representation of swimmable.	Support in part	FFNZ shares the submitter's concerns about the accuracy and achievability of the targets in Table 3.11-1 and refers to its concerns about the assumptions as set out in its submission on Variation 1. FFNZ supports giving effect to the Vision & Strategy and considers that this can be achieved without the need to adopt numeric targets or attribute states for 2096 (as proposed in its submission on Variation 1). FFNZ considers that this would address the submitter's concerns about the Vision & Strategy, NPS-FM, healthy and vibrant communities, achievable water quality outcomes and E coli/pathogen relationship.

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					<p>FFNZ might support alternative attribute states or targets if they were based on appropriate assumptions, were realistic, achievable and gave effect to the superior statutory documents. However, it cannot support alternative targets or attribute states without reviewing or analysis the details of any alternatives.</p> <p>FFNZ also agrees that PPC1 ought to be amended to give effect to the NPSFM (this is partly the reason for the amendment FFNZ seeks to Objective 1 to include “maintain” and the suggestion it makes in its submission on Variation 1 about adopting NOF bands for each attribute state as an alternative to 80 year numeric targets).</p> <p>FFNZ notes that the submitter promotes the implementation of Land Use Capability (“LUC”) in PC1 in general without particulars on how LUC would be adopted or used or how the Plan is to be amended to accommodate any change. Given the generality of the submission point FFNZ can only respond that it generally opposes Land Use Capability as an allocation method but reserves its position until it sees further particulars from the submitter.</p>
Balle Bros Group Submitter ID: 67834	PC1-11386	Objective 1	AMEND Objective 1 to read: "Objective 1: Long-term <u>maintenance</u> , restoration and protection of water quality <u>as relevant</u> for each sub- catchment and Freshwater Management Unit... ...By 2096, <u>the management of</u> discharges of nitrogen, phosphorus,	Support	FFNZ considers that the NPS-FM requires water quality to be maintained within a NOF band and that while the Vision & Strategy says “restore and protect” there may be times where “maintain” is the appropriate metric (see particulars in Submission on Variation 1). FFNZ supports an amendment to Objective 1 that records the requirement to maintain.

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			sediment and microbial pathogens to land and water result in achievement of the restoration and protection of the 80-year water quality attribute targets in Table 3.11-1."		<p>FFNZ also supports the additional phrase “as relevant” in the submitter’s Objective 1 amendments. Such an amendment will have the same outcome as FFNZ’s proposed addition of the phrase “/or” in Objective 1 between restoration and protection. Both the submitter’s and FFNZ’s proposed amendments show that sometimes not all of the combinations of alternatives are relevant or should be used.</p> <p>FFNZ in its submission on Variation 1 also seeks the “management of discharges.” FFNZ considers that this is broad enough to include diffuse and point source discharges and that it is appropriate to “manage” discharges as opposed to reduce (or to leave this ambiguous) because there are a range of mitigation options that may assist to achieve the 10 year targets or the long term achievement of the Values and Vision & Strategy that are not simply about reducing contaminants e.g. wetlands, offsets, edge of field mitigations etc.</p>
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11154	Objective 1 (Values)	<p>AMEND Objective 1 AND/OR ADD new Objectives to give effect to the following intent: <u>"Objective 1A Water management Values: Surface water bodies are managed in a manner which safe guards their life supporting capacity and recognises and provides for the Values in Section 3.11.1.</u> <u>Objective 1B Targeted and risk based approach to managing land and</u></p>	Oppose in part	<p>FFNZ also seeks that the values in section 3.11.1 are recognised and provided for (see for example amendments proposed to Objective 1 in FFNZ’s submission on Variation 1). However, FFNZ considers that safeguarding life supporting capacity is not the only consideration when managing surface water bodies and should not be elevated above other Values in Section 3.11.1.</p> <p>For these reasons FFNZ does not support Objective 1A.</p>

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			<p><u>water resources which is focused on sub-catchments:</u> <u>(ii) water quality is managed to ensure that:</u> <u>(a) water quality is maintained in those rivers and lakes where the existing water quality is at a level sufficient to support the Values in Section 3.11.1 Objective 1A</u> <u>(b) water quality is enhanced in those rivers and lakes where the existing water quality is not at a level sufficient to support the Values in Section 3.11.1 Objective 1A, so that the values are supported by 2097;</u> <u>(c) accelerated eutrophication and sedimentation of lakes in the catchment is prevented or minimised."</u></p>		<p>FFNZ also seeks the long term maintenance, restoration and /or protection of water quality (see amendments to Objective 1 in FFNZ's submission on Variation 1) but considers that the submitter's relief sought is written like a policy rather than an objective because of the specific course of actions proposed.</p> <p>In respect of Objective 1B, FFNZ also supports a sub-catchment approach. However, it is concerned that as worded this objective imposes strict obligations to maintain water to 80 year targets (as opposed to considering a proportionate approach in each sub-catchment that takes into account, inter alia, distance from 10 year targets, sector contributions and resources reasonably available, as proposed in FFNZ's submission on Variation 1).</p> <p>For these reasons, FFNZ opposes Objective 1B as worded but supports the principle of a tailored sub-catchment approach.</p>
Cameron, Bruce Submitter ID: 60603	PC1-6129	Objective 1	<p>RETAIN the long-term restoration and protection of water quality for the Waikato and Waipā Rivers sought by Objective 1. AND AMEND Objective 1 to - remove flood/high flow conditions from water quality target data; address contaminants on a sub-catchment basis to enable targeting of the highest omitting sub-catchments; be holistic and include all sources influencing the health and well-being</p>	Support in part	<p>FFNZ agrees that the long term water quality should be restored and protected but FFNZ considers that "maintained" should be added to the first sentence of Objective 1 to give effect to the NPS-FM.</p> <p>FFNZ shares the submitter's concern that the numeric attribute states do not take into account or provide for anomalies or spikes e.g. flood or other unforeseeable events that is not a trend. This is one of the reasons that FFNZ does not support adopting 80 year targets and supports a narrative</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			of the Waikato River and its catchments, for example Koi Carp, point source discharges, and hydro-dams.		<p>approach as set out in the amendments to Objective 1 in its submission on Variation 1.</p> <p>FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ does not support allocation of contaminants to a property level and instead supports the approach the submitter promotes i.e. a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere).</p> <p>FFNZ agrees with the submitter that there is no consistency in the approach between urban and rural; point source and diffuse discharge. FFNZ is not suggesting that the exact same provisions are adopted for all discharges but is seeking changes so that discharges are treated equally and proportionately when compared to the other discharge sources.</p>
Clements, Robyn Ethel Submitter ID: 73097	PC1-7723	Objective 1	AMEND Objective 1 by carrying out a full land use study that covers the 80 years proposed. DELETE Objective 1 in reference to 'converting farm land back to forestry'	Oppose	FFNZ notes that the submitter promotes the adoption of Land Use Capability. FFNZ does not understand whether that means that the submitter seeks the allocation of nitrogen on the basis of LUC or the use of LUC as a decision support tool in preparing FEPs.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			OR AMEND to use methods that look at land use capability to assess land use		Given the generality of the submission point FFNZ can only respond that it generally opposes Land Use Capability as an allocation method but reserves it position until it sees further particulars from the submitter.
Farmers 4 Positive Change (F4PC) Submitter ID: 73355	PC1-10417	Objective 1 (Objective 2 and Table 3.11-1)	<p>REMOVE the first section of Objective 2: 'Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment' and include it within Objective 1</p> <p>AND AMEND PPC1 to adopt a sub-catchment approach to managing land use and water quality tailored to the specific issues faced by the sub-catchment, with a 30 year timeframe to achieve its objectives and a 15-year review.</p> <p>AND AMEND PPC1 after working with farmers to form a long-term plan that achieves the Vision and Strategy.</p> <p>AND REVIEW the interpretation of the Vision and Strategy, including numerical interpretation through Table 3.11-1</p> <p>AND AMEND Table 3.11-1 to ensure the numerical parameters are achievable while giving effect to the Vision and Strategy</p> <p>AND AMEND PPC1 to have realistic achievable goals</p> <p>AND AMEND PPC1 to give farmers confidence to invest and encourage young people into the sector.</p>	Support in part	<p>FFNZ shares the submitter's concerns that the numeric parameters in Table 3.11-1 are not achievable and problematic.</p> <p>FFNZ also share concerns that the effects on economic and community wellbeing has not been appropriately considered when setting the numeric attribute states.</p> <p>FFNZ acknowledges the connection between maintaining, restoration and/or protection of water quality of Objective 1 with the economic wellbeing of people and their communities. FFNZ in its submissions to Variation 1 seeks relief that does so by amendments to Objective 2. As FFNZ shares these concerns it seeks that the relief sought is allowed on these submission points.</p> <p>FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ does not support allocation of contaminants to a property level and instead supports the approach the submitter promotes i.e. a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also seeks a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>opposed to a blanket approach of reducing all contaminants everywhere). Accordingly FFNZ seeks that this submission point be allowed although it would require further particulars on the 30-year initial plan and 15 year review before it can support such a plan.</p> <p>FFNZ agrees that Table 3.11-1 ought to be amended so that the water quality targets are achievable and farmers and communities remain prosperous. In FFNZ's submission it seeks a narrative approach to 80 year targets as opposed to hard wiring numeric targets now. However, it would also support alternative 80 year targets that appropriately provided for farmer and community prosperity, as well as changes in technology, information and science.</p>
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9699	Objective 1	AMEND Objective 1 to read: "Long term <u>maintenance</u> , restoration and/or protection of water quality <u>as relevant</u> for each sub-catchment and Fresh Water Management Unit. By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of the <u>maintenance</u> , restoration and/or protection of the 80 year water quality attribute targets in Table 3.11-1."	Support	<p>FFNZ considers that the NPS-FM requires water quality to be maintained within a NOF band (see particulars in Submission on Variation 1) and supports an amendment to Objective 1 that records the requirement to maintain.</p> <p>FFNZ also supports the additional phrase "as relevant" in the submitter's Objective 1 amendments. Such an amendment will have the same outcome as FFNZ's proposed addition of the phrase "/or" in Objective 1 between restoration and protection. Both the submitters and FFNZ's proposed amendments show that sometimes not all of the combinations of alternatives are relevant or should be used.</p>

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					Accordingly, FFNZ seeks that the submission points be allowed.
Findlay, Andrew Submitter ID: 72021	PC1-8277	Objective 1	DELETE Objective 1 OR AMEND to provide for Natural Capital, a flexible Nitrogen Reference Point, and sub-catchment water quality AND AMEND to provide for conversion from farming to forestry for unproductive land that is suitable for this enterprise AND AMEND water quality monitoring to provide for individual farm gate testing of loss of contaminants.	Oppose	<p>The submitter has not provided much particulars on what is sought as relief.</p> <p>FFNZ notes that the submitter promotes the implementation of Natural Capital in Healthy Rivers. FFNZ does not understand whether that means that the submitter seeks the allocation of nitrogen on the basis of natural capital or how natural capital is to be measured or if the use of natural capital as a decision support tool in preparing FEPs.</p> <p>Given the generality of the submission point FFNZ can only respond that it generally opposes Land Use Capability as proxy for natural capital if used as an allocation method but reserves it position until it sees further particulars from the submitter.</p> <p>FFNZ supports the nitrogen reference point as long as it is not used as benchmark, grandparenting of N or to allocate N. FFNZ considers that it should be used simply to indicate where farmers are at present and as a trigger point for decisions on N increase e.g. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters. It is not understood what the submitter means with a 'flexible Nitrogen Reference point' and accordingly FFNZ opposes the submission point until it receives better particulars from the submitter.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>FFNZ submitted that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis.</p> <p>FFNZ prefers freedom of landowners to choose which land use it wants to undertake on its land as long as it is within acceptable limits. This allows landowners with some flexibility and allows innovation. This in FFNZ view is a better approach than forcing a landowner to convert use of the landowner's property for a council designated use. Accordingly, FFNZ seeks that this submission point be disallowed.</p> <p>FFNZ does not support allocation of contaminants to a property level and seeks a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. Accordingly, FFNZ seeks that the submitters submission point on farm gate test and monitoring be disallowed.</p>
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10455	Objective 1	AMEND Objective 1 to read: "...By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in the achievement of the restoration and protection, and where necessary restoration, of the 80 year water quality to achieve the 80 year attribute targets <u>states</u> in Table 3.11-1."	Support	FFNZ does not consider it is always necessary to both restore and protect an attribute state. FFNZ also agrees with the use of attribute states rather than attribute targets. Accordingly FFNZ seeks that the submission points be allowed.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Gleeson, Graeme B Submitter ID: 73800	PC1-6448	Objective 1 (Table 3.11-1)	RETAIN the intent of Objective 1. AND AMEND Table 3.11-1 so that the water quality targets are achievable, provide for ecosystem health and enable prosperous, vibrant communities. AND AMEND water quality targets to provide for ecosystem health and cultural values, but also enable the social and economic well-being of people and communities. AND AMEND Table 3.11-1 so that the targets do not apply during flood events or when the parameter does not influence the value. E.coli limits should apply at times when people are likely to swim or when contact with water occurs for cultural reasons.	Support in part	FFNZ shares the submitters concerns with the accuracy and achievability of the proposed targets in Table 3.11-1. The submitter's concerns appear to be that the effects on economic and community wellbeing has not been appropriately considered when setting the numeric attribute states. If this is correct, FFNZ shares these concerns and seeks that the relief sought is allowed. FFNZ shares the submitter's concern that the numeric attribute states do not take into account or provide for anomalies or spikes e.g. flood or other unforeseeable events that is not a trend. This is one of the reasons that FFNZ does not support adopting 80 year targets and supports a narrative approach as set out in the amendments to Objective 1 in its submission on Variation 1.
Guy, Denise and John Submitter ID: 73945	PC1-3809	Objective 1	AMEND PPC1 with clear notification as to what land use is required on a property going forward so farm use can be changed to meet both environmental mitigation and financial stability. AND DELETE the Nitrogen Reference Point provisions AND REPLACE with a provision that the highest nitrate level (that the 'high users' must adhere to) be the upper	Oppose	FFNZ prefers freedom of landowners to choose which land use it wants to undertake on its land as long as it is within acceptable level. This allows the landowner some flexibility and allows innovation. This in FFNZ view is a better approach than forcing a landowner to only use the landowner's property for a council designated use. Accordingly, FFNZ seeks that this submission point be disallowed. FFNZ supports the Nitrogen Reference Point as long as it is not used as benchmark, grandparenting of N or to allocate N. FFNZ considers that it should be used simply to indicate where farmers are at present

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			level for everyone no matter where/what farming type. AND AMEND the contaminant loss from farm provisions of Objective 1 to account for the contribution that Koi Carp make and include rules to remove Koi Carp from waterways.		<p>and as a trigger point for decisions on N increase e.g. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters. It is not understood what the submitter means or the particular suggested provisions for highest nitrate level and accordingly FFNZ opposes the submission point until it receives better particulars from the submitter.</p> <p>Rules that landowners should remove Koi carp would be inappropriate because a landowner does not have a level of control over a Koi carp (like it does with a pet or livestock). Accordingly, FFNZ seeks that the submission point be disallowed. However, FFNZ shares the submitter's concerns that all contributions to the issues with water quality be considered.</p>
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5362	Objective 1 (Table 3.11-1)	AMEND Objective 1 to read: "By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of the restoration and protection of the 80 year water quality attribute target goals in Table 3-11.1. <u>By 2066 discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of 30 percent of the restoration and protection of the 80 year water quality attribute goals in Table 3-11.1.</u> "	Oppose in part	<p>FFNZ does not consider it to be appropriate to lock in 30% by 2066 (or any other percentage within a long or medium time-line) when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others.</p> <p>Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with a short term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND by including the concept of the three well-beings into Objective 1.		
Hill Country Farmers Group Submitter ID: 73321	PC1-7471	Objective 1 (Table 3.11-1)	<p>AMEND Objective 1 to read: "Objective 1: Long-term <u>maintenance, restoration and protection of water quality as relevant for each sub-catchment and Freshwater Management Unit...</u></p> <p>By 2096, <u>the management of discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of the restoration and protection of the 80-year water quality attribute targets in Table 3.11-1.</u>"</p> <p>AND AMEND Table 3.11-1 to reflect in stream nitrogen concentrations consistent with the 95th percentile target in the National Objectives Framework.</p> <p>AND REMOVE from Table 3.11-1 the E.coli numerical parameters for flood condition and high flow conditions/events.</p>	Support in part	<p>FFNZ seeks that the submissions points on Objective 1 be allowed.</p> <p>FFNZ considers that the NPS-FM requires water quality to be maintained within a NOF band and that while the Vision & Strategy says “restore and protect” there may be times where “maintain” is the appropriate metric (see particulars in Submission on Variation 1). FFNZ supports an amendment to Objective 1 that records the requirement to maintain.</p> <p>FFNZ also supports the additional phrase “as relevant” in the submitter’s Objective 1 amendments. Such an amendment will have the same outcome as FFNZ’s proposed addition of the phrase “/or” in Objective 1 between restoration and protection. Both the submitter’s and FFNZ’s proposed amendments show that sometimes not all of the combinations of alternatives are relevant or should be used.</p> <p>FFNZ in its submission on Variation 1 also seeks the “management of discharges.” FFNZ considers that this is broad enough to allow for a range of mitigation options that may assist to achieve the 10 year targets or the long term achievement of the Values and Vision & Strategy that are not simply about reducing contaminants e.g. wetlands, offsets, edge of field mitigations etc.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>As for the changes sought to Table 3.11-1, FFNZ shares the submitters concerns with the attribute targets. FFNZ considers, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others. Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p>
<p>Holmes, Gavin Submitter ID: 73971</p>	<p>PC1-4531</p>	<p>Objective 1 (Table 3.11-1)</p>	<p>RETAIN Objective 1 and the long-term restoration and protection of water quality for the Waikato and Waipā rivers AND AMEND PPC1 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments (eg, Koi Carp, point source discharges, and hydro-dams) AND REMOVE flood/high flow conditions from water quality target data in Table 3.11-1 AND AMEND to address contaminants on a sub-catchment basis to enable targeting of the highest omitting sub-catchments.</p>	<p>Support</p>	<p>FFNZ shares the submitter’s concerns with the attribute targets set in Table 3.11-1.</p> <p>FFNZ in its submission on Variation 1 seeks the “management of discharges.” FFNZ considers that this is broad enough to include diffuse and point source discharges and that it is appropriate to “manage” discharges as opposed to reduce (or to leave this ambiguous) because there are a range of mitigation options that may assist to achieve the 10 year targets or the long term achievement of the Values and Vision & Strategy that are not simply about reducing contaminants e.g. wetlands, offsets, edge of field mitigations etc. Accordingly, FFNZ seeks that the submitters submission point be allowed.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>FFNZ shares the submitter's concern that the numeric attribute states do not take into account or provide for anomalies or spikes e.g. flood or other unforeseeable events that is not a trend. FFNZ agrees that the numeric targets ought to be amended to reasonably provide for this. Accordingly, FFNZ seeks that the submitters submission point be allowed.</p> <p>FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere). Accordingly, FFNZ seeks that the submitters submission point be allowed.</p>
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-9939	Objective 1 (Table 3.11-1)	AMEND Objective 1 to read: "By 2096, the adverse effects from discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water are reduced resulting in achievement of the desired state of intrinsic freshwater values for the Waikato River, represented by the restoration and protection of the 80-year water quality attribute targets in Table 3.11-1."	Support in part	<p>The Vision & Strategy requires health and wellbeing of the Waikato River to be restored and protected. The Vision & Strategy did not state that it has to be done by 2096 nor did it record the water quality attributes states to be achieved rather it clarified the freshwater values that need to be taken into account to restore and protect the health and wellbeing of the Waikato River.</p> <p>FFNZ has concerns with how the attribute states in table 3.11-1 where arrived at as a supposed representation of the Vision & Strategy. FFNZ considers, inter alia, there are issues with the</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some of the Vision & Strategy values but omits considering others.</p> <p>In light of the above we agree that the outcome sought is better expressed to achieve the desired state of freshwater values of the Waikato as anticipated by the Vision & Strategy than by locking in the targets in what FFNZ sees as a flawed Table 3.11-1. However, FFNZ would go further than the submitter and seek the removal the attribute states in Table 3.11-1 from the objective even if it is clarified that the Table is only a representation.</p> <p>Accordingly, FFNZ seeks that the submission point in regard to the water quality state be linked to the health of the Waikato River (and Vision & Strategy) be allowed but seeks that the reference to attribute states in Table 3.11-1 be disallowed.</p>
<p>Jefferis, Daniel Submitter ID: 72989</p>	<p>PC1-6812</p>	<p>Objective 1 (Table 3.11-1)</p>	<p>RETAIN Objective 1 long-term restoration and protection of water quality for the Waikato and Waipā rivers AND AMEND PPC1 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments AND DELETE flood/high flow conditions from water quality target data (Table 3.11.1)</p>	<p>Support</p>	<p>FFNZ in its submission on Variation 1 seeks the “management of discharges.” FFNZ considers that this is broad enough to include diffuse and point source discharges and that it is appropriate to “manage” discharges as opposed to reduce (or to leave this ambiguous) because there are a range of mitigation options that may assist to achieve the 10 year targets or the long term achievement of the Values and Vision & Strategy that are not simply about reducing contaminants e.g. wetlands, offsets, edge of field mitigations etc. Accordingly, FFNZ</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments		<p>seeks that the submitters submission point be allowed.</p> <p>FFNZ shares the submitter's concern that the numeric attribute states do not take into account or provide for anomalies or spikes e.g. flood or other unforeseeable events that is not a trend. FFNZ agrees that the numeric targets ought to be amended to reasonably provide for this. Accordingly, FFNZ seeks that the submitters submission point be allowed.</p> <p>FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere). Accordingly, FFNZ seeks that the submitters submission point be allowed.</p>
Johnston, Moss and Relda Submitter ID: 72597	PC1-8095	Objective 1	AMEND PPC1 to include urban and industrial contamination. AND AMEND PPC1 to identify pollution areas and deal with them accordingly.	Support in part	<p>FFNZ agrees that there is no consistency in the approach between urban, industrial and rural; point source and diffuse discharge.</p> <p>FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>a blanket approach of reducing all contaminants everywhere).</p> <p>Accordingly, FFNZ seeks that the submitters submission point be allowed.</p>
Lacewood Holdings Ltd Submitter ID: 72589	PC1-8960	Objective 1 (Table 3.11-1)	<p>AMEND Objective 1 so the quality of the water is achievable. AND REMOVE the requirements to be held at or below a properties Nitrogen Reference Point, especially for low discharging operations. AND AMEND to adopt an alternative method to measure nitrogen such as one based on the natural capacity of soils.</p>	Oppose in part	<p>FFNZ shares the submitters concerns that the attribute targets in Table 3.11-1 is not achievable and that the effects on economic and community wellbeing has not been appropriately considered when setting the numeric attribute states.</p> <p>FFNZ considers Nitrogen Reference Point should not be used for a benchmark, grandparenting of N or to allocate N. FFNZ considers that it can be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.</p> <p>FFNZ notes that the submitter seeks the allocation of nitrogen on the basis of LUC or the use of the natural capacity of soils. FFNZ can only respond that it generally opposes such an allocation method for N but reserves it position until it sees further particulars from the submitter.</p>
Lee, Malcolm and Sally Submitter ID: 72932	PC1-8863	Objective 1	AMEND Objective 1 to a sub-catchment approach with communities working together AND	Support in part	FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ does not support allocation of contaminants to a property

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			<p>RENOTIFY and allow submissions on this sub-catchment approach. AND DELETE provisions relating to the Nitrogen Reference Point from Objective 1. If not deleted then AMEND to provide for a Land Use Capability approach. OR AMEND to provide for a sub-catchment approach to allow catchments to monitor its own land use and nitrogen loading to maintain levels at current levels. AND AMEND Objective 1 to provide for the adjustment to the plan to contain rules for the elimination of Koi Carp and to ensure farmers to do not bear this cost. AND AMEND to provide for water quality improvements required by farmers, to be at a sub-catchment level to link the effects caused by farmers either individually or collectively and consider the impacts of farmers. AND MAKE any consequential amendments arising from the submission process.</p>		<p>level and instead supports the approach the submitter promotes i.e. a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner.</p> <p>FFNZ considers Nitrogen Reference Point should not be used for a benchmark, grandparenting of N or to allocate N. FFNZ considers that it can be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.</p> <p>FFNZ notes that the submitter promotes the adoption of Land Use Capability. FFNZ does not understand whether that means that the submitter seeks the allocation of nitrogen on the basis of LUC or the use of LUC as a decision support tool in preparing FEPs.</p> <p>Given the generality of the submission point FFNZ can only respond that it generally opposes Land Use Capability as an allocation method but reserves its position until it sees further particulars from the submitter.</p> <p>FFNZ agrees that there are a range of mitigation options that may assist to achieve the 10 year targets or the long term achievement of the Values and Vision & Strategy that are not simply about reducing contaminants e.g. removal of koi carp, wetlands, offsets, edge of field mitigations etc.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					Accordingly FFNZ seeks that the submission points be allowed except for the submission point on LUC which FFNZ seeks to be disallowed.
Mayne, Anna Submitter ID: 72881	PC1-8982	Objective 1	AMEND PPC1 to ensure sheep and beef farms on hill country are planted in native species, following advice from local hapu, and that historical deforestation is replanted AND AMEND to enable farmers to make an income from native plantings through selective logging, selling seeds to local nurseries, and for use in Rongoa AND AMEND to ensure the OVERSEER Model is not used for a regulatory purpose AND AMEND to encourage the use of the Overseer Report and the Nitrate Leaching Estimate as part of a Farm Environment Plan	Support in part	FFNZ prefers freedom of landowners to choose which land use it wants to undertake on its own property as long as it is within acceptable limits. This allows landowners with some flexibility and allows innovation as well as the aspirations of the individual. This in FFNZ's view is a better approach than forcing a landowner like sheep and beef farmers on hill country to convert to native forests or any land activity that a council can force on the individual. Accordingly, FFNZ seeks that this submission point be disallowed. However, FFNZ shares much of the submitters views on the use of Overseer. FFNZ considers that it can be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase e.g. permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters. Accordingly, FFNZ seeks that this submission point be allowed.
McGovern, Annette Submitter ID: 72969	PC1-8307	Objective 1 (Table 3.11-1)	AMEND Objective 1 to remove references to Table 3.11-1.	Support	FFNZ seeks that this submission be allowed. FFNZ also has reservations about the attribution states in Table 3.11-1 and according do not want them locked in for 80 years in an objective.
New Zealand Steel Ltd	PC1-3696	Objective (Table 3.11-1)	AMEND Objective 1 to clarify application of water quality target provisions.	Support in part	FFNZ considers that there should be consistency in the approach between urban and rural; agriculture

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Submitter ID: 73790					and horticulture and industry; point source and diffuse discharge. FFNZ is seeking changes so that diffuse and point source discharges are treated equally and proportionally. FFNZ would support further clarity on this if there is ambiguity or if parties (including WRC and point source dischargers) have interpreted Objective 1 as solely applying to point source discharges.
Ngaati Tamaoho Trust Te Taiao Roopuu Submitter ID: 74088	PC1-11570	Objective 1	RETAIN the 80-year timeframe in Objective 1. AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable</u> , discharges of nitrogen..."	Oppose	FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years (never mind shortening the overall time frame) when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others. Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim. Accordingly, FFNZ seeks that this submission point is disallowed.
Ngati Haua Iwi Trust	PC1-11822	Objective 1	RETAIN the 80-year timeframe in Objective 1.	Oppose	FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years (never mind shortening the overall time frame) when,

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Submitter ID: 73515			AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable</u> , discharges of nitrogen..."		<p>inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others.</p> <p>Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>Accordingly, FFNZ seeks that this submission point is disallowed.</p>
Nicholson, Chris and Vikki Submitter ID: 72447	PC1-3911	Objective 1	<p>RETAIN the long term restoration and protection of water quality for the Waikato and Waipā Rivers in Objective 1.</p> <p>AND AMEND PPC1 to be holistic and include all factors influencing the health and well-being of the Waikato River and its catchments, including koi carp, point source discharges and hydro-dams.</p> <p>AND AMEND to address contaminants on a sub-catchment basis to enable targeting of catchments with the highest contaminant discharges.</p>	Support	<p>FFNZ in its submission on Variation 1 seeks the “management of discharges.” FFNZ considers that this is broad enough to include diffuse and point source discharges and that it is appropriate to “manage” discharges as opposed to reduce (or to leave this ambiguous) because there are a range of mitigation options that may assist to achieve the 10 year targets or the long term achievement of the Values and Vision & Strategy that are not simply about reducing contaminants e.g. wetlands, offsets, edge of field mitigations etc.</p> <p>FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ does not support allocation of contaminants to a property</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND DELETE from Table 3.11.1 the flood /high flow conditions from water quality target data. AND MAKE any other consequential changes necessary to give effect to decisions requested in this submission.</p>		<p>level and instead supports the approach the submitter promotes i.e. a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere).</p> <p>FFNZ shares the submitter's concern that the numeric attribute states do not take into account or provide for anomalies or spikes e.g. flood or other unforeseeable events that is not a trend. This is one of the reasons that FFNZ does not support adopting 80 year targets and supports a narrative approach as set out in the amendments to Objective 1 in its submission on Variation 1.</p> <p>Accordingly, FFNZ seeks that the submission points be allowed.</p>
<p>Oji Fibre Solutions (NZ) Limited Submitter ID: 73725</p>	<p>PC1-6322</p>	<p>Objective 1</p>	<p>AMEND Objective 1 to read: "By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of the restoration and protection of the 80 year water quality attribute targets <u>goals</u> in Table 3-11.1. <u>By 2066 discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of 30 percent of the</u></p>	<p>Oppose in part</p>	<p>FFNZ does not consider it to be appropriate to lock in 30% by 2066 (or any other percentage within a long or medium term) when there are significant problems with the attribute goals in Table 3.11-1. Amongst others there are issues with the underlying assumptions when setting the attribute goals, issues with the basis of analysis, gap in understanding and knowledge, and when setting of the attribute targets only some values were considered but it omits considering others.</p>

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			<p><u>restoration and protection of the 80 year water quality attribute goals in Table 3-11.1."</u> AND AMEND Objective 1 to incorporate the concept of the three well-beings [social economic and cultural well-being].</p>		<p>Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with a short term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim. Accordingly, FFNZ seeks that the relief sought by the submitter in this submission point be disallowed.</p> <p>FFNZ shares the submitter's concerns that the effects on social, economic and cultural wellbeing has not been appropriately considered when setting the numeric attribute states or needs to be incorporated to be considered with the use of the attribute goals. If this is correct, FFNZ shares these concerns and seeks that the relief sought is allowed.</p>
Ravensdown Limited Submitter ID: 74058	PC1-10096	Objective 1	<p>AMEND Objective 1 to retain the overall intent; Objective 1 should read: "Objective 1: Long term <u>maintenance</u>, restoration and/or protection of water quality <u>as relevant</u> for each sub-catchment and Freshwater Management Unit. ...result in achievement of the <u>maintenance</u>, restoration and/or protection <u>as relevant</u> of the..."</p>	Support	<p>FFNZ considers that the NPS-FM requires water quality to be maintained within a NOF band and that while the Vision & Strategy says "restore and protect" there may be times where "maintain" is the appropriate metric (see particulars in Submission on Variation 1). FFNZ supports an amendment to Objective 1 that records the requirement to maintain.</p> <p>FFNZ also supports the additional phrase "as relevant" in the submitter's Objective 1 amendments. Such an amendment will have the same outcome as FFNZ's proposed addition of the phrase "/or" in Objective 1 between restoration and protection. Both the submitter's and FFNZ's</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>proposed amendments show that sometimes not all of the combinations of alternatives are relevant or should be used.</p> <p>FFNZ seeks that the submission points be allowed.</p>
<p>Roberts, Jessica Submitter ID: 74141</p>	<p>PC1-7133</p>	<p>Objective 1</p>	<p>RETAIN the long-term restoration and protection of water quality for the Waikato and Waipā rivers. AND AMEND PPC1 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments. AND REMOVE flood/high flow conditions from water quality target data. AND AMEND to address contaminants on a sub-catchment basis to enable targeting of the highest omitting sub-catchments.</p>	<p>Support</p>	<p>FFNZ in its submission on Variation 1 seeks the “management of discharges.” FFNZ considers that this is broad enough to include diffuse and point source discharges and that it is appropriate to “manage” discharges as opposed to reduce (or to leave this ambiguous) because there are a range of mitigation options that may assist to achieve the 10 year targets or the long term achievement of the Values and Vision & Strategy that are not simply about reducing contaminants e.g. wetlands, offsets, edge of field mitigations etc.</p> <p>FFNZ shares the submitter’s concern that the numeric attribute states do not take into account or provide for anomalies or spikes e.g. flood or other unforeseeable events that is not a trend. This is one of the reasons that FFNZ does not support adopting 80 year targets and supports a narrative approach as set out in the amendments to Objective 1 in its submission on Variation 1.</p> <p>FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ does not support allocation of contaminants to a property level and instead supports the approach the submitter promotes i.e. a holistic sub-catchment approach that considers all sources of contaminants</p>

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					<p>and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere).</p> <p>Accordingly, FFNZ seeks that the submission points be allowed.</p>
<p>The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122</p>	<p>PC1-8218</p>	<p>Objective 1</p>	<p>AMEND Objective 1 to read: "Objective 1: <u>The restoration and protection of water quality to achieve healthy rivers by 2050</u> Long term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit" AND RETAIN the explanation.</p>	<p>Oppose</p>	<p>FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years (never mind shortening the overall time frame to 2050) when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others.</p> <p>Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>Accordingly, FFNZ seeks that this submission point is disallowed.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Timberlands Limited Submitter ID: 73036	PC1-3067	Objective 1	AMEND Objective 1 by expressing the 80 year numerical attribute targets for nitrogen as a single set of TN numerical attribute targets measured in the main stem of the Waikato River at the bottom of each Freshwater Management Unit. AND AMEND by revising the 10 year numerical nitrogen attribute targets to show greater consistency between sub-catchment loads, making sure that the degree of reduction required is proportionate to the amount of current discharge.	Oppose	FFNZ opposes using a lake attribute states for a river and accordingly seeks that the relief sought in the submitter's submission point be disallowed. FFNZ does not support allocation or a linking of proportionate reductions to sub-catchment loads. Therefore it seeks that relief sought in the submitter's submission point is disallowed.
Trinity Lands Ltd Submitter ID: 72608	PC1-9752	Objective 1	AMEND Objective 1/Table 3.11-1 water quality attributes to internationally acceptable levels: E coli 95% less than 1000/100ml; nitrate annual median less than 2mg/litre; water clarity at 1 metre at times of annual return low flow; and phosphorus less than 20mg/1000 litres.	Oppose	FFNZ does not have sufficient information on how the suggested levels would affect the social, economic and culture wellbeing of the community and neither does it have sufficient information to understand the impact of such a level on the water quality and health of the Waikato River. Accordingly, FFNZ cannot support the submission point and until it receives better particulars seek that the submission point be disallowed.
Turangawaewae Marae Submitter ID: 74173	PC1-12159	Objective 1	RETAIN the 80-year timeframe in Objective 1. AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable</u> , discharges of nitrogen..."	Oppose	FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years (never mind shortening the overall time frame to 2050) when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of

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					<p>the targets only considers some values but omits considering others.</p> <p>Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>Accordingly, FFNZ seeks that this submission point is disallowed.</p>
<p>Tuwharetoa Māori Trust Board Submitter ID: 73356</p>	<p>PC1-10256</p>	<p>Objective 1</p>	<p>RETAIN the 80-year timeframe in Objective 1. AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable</u>, discharges of nitrogen..."</p>	<p>Oppose</p>	<p>FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years (never mind shortening the overall time frame to 2050) when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others.</p> <p>Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p>

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					Accordingly, FFNZ seeks that this submission point is disallowed.
Verkerk, Gwyneth Submitter ID: 60476	PC1-1270	Objective 1	AMEND Objective 1 so that the importance of wetlands in ensuring sustainable farming practices into the future beyond the period of PPC1 must be given greater emphasis in the early stages of plan development. AND the work including expanding the regions wetlands is managed at a sub-catchment planning level.	Support	We understand the submitter to acknowledge the value of a wetland as a mitigation option to assist with achieving the water quality. FFNZ in its submission on Variation 1 seeks the “management of discharges.” FFNZ considers that it is appropriate to “manage” discharges as opposed to reduce (or to leave this ambiguous) because there are a range of mitigation options that may assist to achieve the 10 year targets or the long term achievement of the Values and Vision & Strategy that are not simply about reducing contaminants e.g. wetlands, offsets, edge of field mitigations etc. If our understanding of the submitter’s concern is correct, FFNZ shares these concerns and seeks that the relief sought is allowed.
Waahi Pa Marae Committee Submitter ID: 73751	PC1-12107	Objective 1	RETAIN the 80-year timeframe in Objective 1. AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable</u> , discharges of nitrogen..."	Oppose	FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years (never mind shortening the overall time frame to 2050) when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others. Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision &

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					<p>Strategy working in combination with short term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>Accordingly, FFNZ seeks that this submission point is disallowed.</p>
<p>Waahi Whaanui Trust Submitter ID: 73537</p>	PC1-11922	Objective 1	<p>RETAIN the 80-year timeframe in Objective 1. AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable</u>, discharges of nitrogen..."</p>	Oppose	<p>FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years (never mind shortening the overall time frame to 2050) when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others.</p> <p>Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>Accordingly, FFNZ seeks that this submission point is disallowed.</p>
<p>Waikato and Waipā River Iwi</p>	PC1-3245	Objective 1	<p>RETAIN the 80-year timeframe in Objective 1.</p>		<p>FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years</p>

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Submitter ID: 74035			AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable</u> , discharges of nitrogen..."		<p>(never mind shortening the overall time frame to 2050) when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others.</p> <p>Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>Accordingly, FFNZ seeks that this submission point is disallowed.</p>
Waikato Regional Council Submitter ID: 72890	PC1-2985	Objective 1	RETAIN Objective 1 AND AMEND Objective 1 to acknowledge climate change as required by the NPSFM.	Oppose in part	<p>FFNZ understands that the submitter's concerns relate to the lack of taking into account the effects of climate change when setting the attribute targets. FFNZ also has concerns with the attribute state, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others.</p> <p>However, where FFNZ disagrees with the submitter is on how to fix the issues with the attribute states. FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>outcomes anticipated by the Vision & Strategy working in combination with short term targets which are achievable. As knowledge and information becomes available, eg information on climate change, better and more accurate targets can be progressively set to reach the long term aim.</p> <p>Accordingly, FFNZ seeks that this submission point is disallowed.</p>
<p>Wairakei Pastoral Ltd Submitter ID: 74095</p>	<p>PC1-11261</p>	<p>Objective 1</p>	<p>AMEND Objective 1 to read: "Objective 1: Long-term <u>maintenance</u>, restoration and/or protection of water quality <u>as relevant</u> for each sub-catchment and Freshwater Management Unit... By 2096, <u>the management of</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens..."</p>	<p>Support</p>	<p>FFNZ considers that the NPS-FM requires water quality to be maintained within a NOF band and that while the Vision & Strategy says "restore and protect" there may be times where "maintain" is the appropriate metric (see particulars in Submission on Variation 1). FFNZ supports an amendment to Objective 1 that records the requirement to maintain.</p> <p>FFNZ also supports the additional phrase "as relevant" in the submitter's Objective 1 amendments. Such an amendment will have the same outcome as FFNZ's proposed addition of the phrase "/or" in Objective 1 between restoration and protection. Both the submitter's and FFNZ's proposed amendments show that sometimes not all of the combinations of alternatives are relevant or should be used.</p> <p>FFNZ in its submission on Variation 1 also seeks the "management of discharges."</p> <p>Accordingly, FFNZ seeks that the submission points be allowed.</p>

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Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2076	Objective 1	AMEND FMU Map to show re-defined FMU's based on revised sub-catchments, taking into account the physical attributes of land areas. (Objective 1)	Support in part	<p>FFNZ understands that the submitter is asking for smaller FMUs or new defined sub catchments where farms would deal with comparatively similar physical attributes rather than the bigger FMUs. The submitter then seeks these smaller units or sub catchments to set the target reductions.</p> <p>FFNZ in its submission on Variation 1, raises its concerns with Map 3.11-1 with the FMUs (inter alia spatial scale for river too large, but spatial scale for the lake FMUs is too small and that similar sub-catchments are not grouped together) and with the spatial scale of sub-catchments. FNZ also seeks that contaminants are more appropriately targeted at a sub-catchment level and supports a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere). Our understanding is that this is similar to what the submitter seeks. If this is correct we ask that the submission point be allowed.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Williamson, Stephen David Submitter ID: 73040	PC1-8666	Objective 1	DELETE Objective 1 requirements for farms to be held at or below a property's Nitrogen Reference Point, especially for low discharging operations AND DELETE the use of the OVERSEER Model AND, if an allocation of nitrogen discharges is needed, base the allocation on the natural capacity of soils and not on existing land uses.	Oppose in part	<p>FFNZ does not support allocation of contaminants to a property level and instead supports a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere). FFNZ considers this approach which is not N myopic would look after low discharging operations and be flexible enough to allow for movement in circumstances mention by the submitter (e.g. droughts).</p> <p>FFNZ considers even with all its faults Overseer can be helpful as long as not used to benchmark N, grandparenting of N or to allocate N. FFNZ considers that it should be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase e.g. permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.</p> <p>FFNZ notes that the submitter seeks the allocation of nitrogen on the basis of LUC. FFNZ opposes Land Use Capability as an allocation method but reserves it position until it sees further particulars from the submitter.</p>

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Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6094	Objective 2	AMEND Objective 2 to read as follows (or similar to address reason for submission point): <u>"Waikato and Waipā communities are able to provide for their social, economic and cultural well-being in the short term (10 years) and long term (80 years), recognising that the Waikato and Waipā communities and their economy may ultimately benefit from the restoration and protection of water quality in the Waikato River catchment. This is turn will which enables the people and communities to continue to provide for their social, economic and cultural well-being."</u>	Support	FFNZ is concerned that, as worded, objective 2 suggested that it was restoring water quality that enabled communities to provide for their wellbeings. FFNZ considers that providing for wellbeings should be first and at the same time restoring and protecting water quality.
Bailey, James Submitter ID: 73926	PC1-4786	Objective 2	AMEND Table 3.11-1 to give effect to the Vision and Strategy including all 13 of its objectives with endorsement from all five river iwi AND AMEND to give effect to the National Policy Statement for Freshwater Management AND AMEND to provide for healthy and vibrant communities AND AMEND to give effect to water quality outcomes that are actually achievable. AND MAKE consequential amendments.	Support in part	FFNZ supports giving effect to the Vision & Strategy and NPS-FM. FFNZ is concerned about the implications social, cultural, economic and environment factors if all 13 objectives were given effect to (it depends on how they are balanced). FFNZ agrees that healthy and vibrant communities ought to be provided for and this is not reflected in Objective 2 (which implies that restoring water quality that enabled communities to provide for their wellbeings or that the wellbeings were secondary to water quality).
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6573	Objective 2	ADOPT Objective 2 as notified. AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	Oppose in part	FFNZ opposes Objective 2 as notified if the implication is that it is restoring water quality that enables communities to provide for their wellbeings or that the wellbeings are secondary to restoring water quality. FFNZ considers that the wording

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					ought to be clarified such that water quality is maintained, restored or protected whilst enabling people and communities to provides for their wellbeings.
Balle Bros Group Submitter ID: 67834	PC1-11387	Objective 2	AMEND Objective 2 to read: "Objective 2: Social, economic and cultural well-being is <u>recognised and maintained</u> in the long term... ...Waikato and Waipā communities and their economy experience <u>measureable</u> benefit from the restoration and protection of water quality <u>as relevant in each sub-catchment of</u> the Waikato River catchment, which enables the people and communities to continue to provide for their social, economic and cultural well-being." AMEND PPC1 to ensure the rules give effect to Objective 2.	Support in part	FFNZ supports providing higher recognition of wellbeing through the use of the word "recognised" and that there ought to be measurable benefit in each sub-catchment. However, FFNZ considers that further clarification is required if the implication is that it is restoring water quality that enables communities to provide for their wellbeings or that the wellbeings are secondary to restoring water quality. FFNZ considers that the wording ought to be clarified such that water quality is maintained, restored or protected whilst enabling people and communities to provides for their wellbeings.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11233	Objective 2	AMEND Objective 2 so that it is made explicit that the Objective is to enable people and communities to continue to provide for their social, economic, and cultural well-being, to be resilient and vibrant, and to provide for future generations. AND AMEND Objective 2 to give effect to the following intent: "Social, economic and cultural well-being is recognised and maintained in the long term /Te Whaingā 2: Ka whakaOngia tenoranga a-papori, a-ohanga, a-ahurea hoki i nga tauroa. Management of land and water	Support in part	FFNZ agrees that wellbeings ought to be recognised In the long term. However, FFNZ considers that further clarification is required if the implication is that it is restoring water quality that enables communities to provide for their wellbeings or that the wellbeings are secondary to restoring water quality. FFNZ considers that the wording ought to be clarified such that water quality is maintained, restored or protected whilst enabling people and communities to provides for their wellbeings.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			resources within the Waikato River Catchment recognises and provides for Waikato and Waipā communities and their economic and social well-being, vibrancy and resilience."		
Buckley, Peter Ross Submitter ID: 71423	PC1-1370	Objective 2	<p>RETAIN Objective 2 the maintenance of long-term social, economic and cultural well-being in the Waikato and Waipā catchments.</p> <p>AND AMEND to develop robust indicators to measure social, economic and cultural well-being.</p> <p>AND DELETE the Nitrogen Reference Point to align with Objective 2.</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to made, through a tailored Farm Environment Plan.</p> <p>AND AMEND to address contaminants on a sub-catchment basis to enable targeting of the highest discharging sub-catchments.</p> <p>AND WITHDRAW PPC1 until the withdrawn area and the Waikato River Authority's Vision and Strategy has been amended. Then conduct a Section 32 analysis on the revised impact that PPC1 could have on society and the economy.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that amendments ought to be made to Objective 2 if the implication is that it is restoring water quality that enables communities to provide for their wellbeings or that the wellbeings are secondary to restoring water quality. FFNZ considers that the wording ought to be clarified such that water quality is maintained, restored or protected whilst enabling people and communities to provides for their wellbeings.</p> <p>FFNZ agrees that there ought to be robust indicators for measuring the three wellbeings.</p> <p>FFNZ supports the development of mitigations in FEPs that take into account the reasonable cost or resources available to the farm enterprise.</p> <p>FFNZ supports a robust section 32 analysis on the effects on the three wellbeings.</p>
Cameron, Bruce Submitter ID: 60603	PC1-6130	Objective 2	WITHDRAW PPC1 until the Hauraki Iwi and the Waikato River Authority's Vision and Strategy has been	Support in part	FFNZ considers that amendments ought to be made to Objective 2 if the implication is that it is restoring water quality that enables communities to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>amended, then conduct a Section 32 analysis to investigate the revised impact of PPC1 on society and economy.</p> <p>RETAIN Objective 2.</p> <p>AND AMEND PPC1 to align with the intention of Objective 2 by - removing the Nitrogen Reference Point; enabling appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.</p> <p>AND AMEND to ensure PPC1 addresses contaminants on a sub-catchment basis to enable targeting of the highest emitting sub-catchments.</p> <p>AND AMEND PPC1 to include robust indicators to measure social, economic and cultural well-being.</p>	Oppose in part	<p>provide for their wellbeings or that the wellbeings are secondary to restoring water quality. FFNZ considers that the wording ought to be clarified such that water quality is maintained, restored or protected whilst enabling people and communities to provides for their wellbeings.</p> <p>FFNZ supports tailored FEPs and mitigation options assessed within the MPA framework proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ supports targeting hot spots i.e. most important sub-catchments in terms of water quality issues.</p> <p>FFNZ agrees that there ought to be robust indicators for measuring the three wellbeings.</p>
Department of Conservation Submitter ID: 71759	PC1-10537	Objective 2	<p>AMEND Objective 2 to recognise the benefits to the environment from the restoration and protection of water quality in the Waikato and Waipā River catchments.</p> <p>AND DELETE the word 'continue' from the objective.</p>	Oppose	FFNZ considers that the focus of Objective 2 ought to be on providing for social, economic and cultural wellbeing as opposed to focusing on environmental benefits.
Farmers 4 Positive Change (F4PC) Submitter ID: 73355	PC1-10420	Objective 2	<p>AMEND Objective 2 to make it explicit that it is to enable people and communities to continue to provide for their social, economic, and cultural well-being, and to provide for future generations</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports amendments to clarify that social, economic and cultural wellbeing will be provided for and enabled (whether that be through Objective 1 or through amendments to Objective 2).</p> <p>FFNZ supports a sub-catchment approach.</p>

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			AND DELETE the first section of Objective 2: " Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment " and include it within Objective 1 Objective 2: AMEND PPC1 to adopt a sub-catchment approach to managing land use and water quality tailored to the specific issues faced by the sub-catchment, with a 30 year timeframe to achieve its objectives and a 15-year review.		FFNZ is not sure of the costs and benefits of adopting a 30 year timeframe. FFNZ does not support the 80 year numeric targets for reasons including that they are based on flawed assumptions. FFNZ is concerned that 30 year targets could have the same issue. FFNZ considers it appropriate to track progress towards 10 year targets and to do a stock take in 10 years time when more information is known about the catchment, technology, water quality issues etc.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9700	Objective 2	AMEND Objective 2 to read: "Waikato and Waipā communities and their economy benefit from the <u>maintenance</u> , restoration and/or, protection of water quality in the Waikato River catchment, <u>in a way and at a rate</u> which enables the people and communities to continue to provide for their social, economic and cultural well-being."	Support in part	FFNZ supports the addition of the word "maintenance" (which is consistent with the NPS-FM) and clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing).
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10457	Objective 2	AMEND Objective 2 to read: "Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment, <u>which and the restoration and protection is undertaken in a way and at a rate that</u> enables the people and communities to continue to provide for their social, economic and cultural well-being."	Support in part	FFNZ supports clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing).

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Fonterra Shareholders Council Submitter ID: 72610	PC1-10635	Objective 2	AMEND Objective 2 to make the intent clearer as follows: "Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment, which <u>and the restoration and protection is undertaken in a way and at a rate that enables the people and communities to continue to provide for their social, economic and cultural well-being.</u> "	Support in part	FFNZ supports clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing).
GBC Winstone Submitter ID: 73992	PC1-2861	Objective 2	AMEND Objective 2 to read: "Waikato and Waipā communities... Waikato River catchment, which <u>and the restoration and protection is undertaken in a way and at a rate that enables the people and communities...</u> "	Support in part	FFNZ supports clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing).
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5372	Objective 2	DELETE Objective 2 and incorporate the concept of the three well-beings into Objective 1.	Support in part	FFNZ supports amendments to clarify that social, economic and cultural wellbeing will be provided for and enabled (whether that be through Objective 1 or through amendments to Objective 2).
Hill Country Farmers Group Submitter ID: 73321	PC1-7486	Objective 2	AMEND Objective 2 to read: "Objective 2: Social, economic and cultural well-being is <u>recognised and maintained</u> in the long term... Waikato and Waipā communities and their economy <u>experience measurable benefits</u> benefit from the <u>maintenance</u> , restoration and <u>/or</u> protection of water quality <u>as relevant</u> , in <u>each sub- catchment of</u> the Waikato River catchment, which	Support in part	FFNZ supports the addition of the word "maintenance" (which is consistent with the NPS-FM) and clarification that benefits must be measurable and tangible. It also supports consideration of this at a sub-catchment level. However, FFNZ has concerns that Objective 2 needs further clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements

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			enables the people and communities to continue to provide for their social, economic and cultural well-being." AND WITHDRAW PPC1 and consult with hill country communities.		have to be those that provide for social, economic and cultural wellbeing).
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-9940	Objective 2	AMEND Objective 2 to read: "Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment. <u>The restoration and protection of water quality should</u> enables the people and communities to continue to provide for their social, economic and cultural well-being."	Support in part Oppose in part	FFNZ supports the submission point if the effect is that social, economic and cultural well-being (costs and benefits) are taken into account in considering water quality improvements. FFNZ does not support the submission point if the effect is that any water quality efforts will have positive effects for social, economic and cultural well-being.
J Swap Ltd Submitter ID: 71618	PC1-6405	Objective 2	AMEND Objective 2 as follows: "Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment, which <u>and the restoration and protection is undertaken in a way and at a rate that enables the people and</u> communities to continue to provide for their social, economic and cultural well-being."	Support in part	FFNZ supports clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing).
King Country Energy Limited Submitter ID: 60693	PC1-7817	Objective 2	RETAIN Objective 2. AND MAKE any similar amendments with like effect. AND MAKE any consequential amendments.	Oppose in part	FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					undertaken at a rate that enables and provides for social, economic and cultural well-being.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9136	Objective 2	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> ."	Oppose in part Support in part	FFNZ supports clarity that prosperity is provided for. However, FFNZ considers that all members of society and all wellbeings ought to be considered, not just River iwi. FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.
Matamata-Piako District Council Submitter ID: 73419	PC1-3463	Objective 2	RETAIN Objective 2.	Oppose in part	FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.
Mercury NZ Limited Submitter ID: 73182	PC1-9506	Objective 2	AMEND Objective 2 to read: "Waikato and Waipā communities and their economy (<u>as well as the regional and national communities and economies</u>) benefit from the restoration and protection of water quality in the Waikato <u>and Waipā River catchments</u> , which enables the	Oppose in part	FFNZ agrees that the focus ought to be on regional and national communities and economies and the Waipa river. However, FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			people and communities to continue to provide for their social, economic and cultural well-being."		this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.
Miraka Limited Submitter ID: 73492	PC1-8906	Objective 2	RETAIN Objective 2 AND AMEND the last sentence of Reasons for Adopting Objective 2 to read as follows: "... and it is important to minimise social disruption <u>and economic hardship</u> during this transition."	Oppose in part Support in part	FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being. FFNZ agrees with the addition of the wording "economic hardship."
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4605	Objective 2	RETAIN Objective 2.	Oppose in part	FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11823	Objective 2	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term..."	Oppose in part Support in part	FFNZ supports clarity that prosperity is provided for. However, FFNZ considers that all members of society and all wellbeings ought to be considered, not just River iwi.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> ."		FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6366	Objective 2	DELETE Objective 2 and incorporate the concept of the three well-beings [social economic and cultural well-being] into Objective 1.	Support in part	FFNZ supports amendments to clarify that social, economic and cultural wellbeing will be provided for and enabled (whether that be through Objective 1 or through amendments to Objective 2).
Primary Land Users Group Submitter ID: 71427	PC1-11129	Objective 2	AMEND PPC1 to remove the requirement for a Nitrogen Reference Point AND AMEND to address contaminants on a sub-catchment basis by requiring the land manager to apply the appropriate best practicable option and target the highest emitting sub-catchments AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made.	Support in part	FFNZ supports the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ supports a sub-catchment approach and a focus on BPO (as defined in FFNZ's submission on Variation 1).
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7772	Objective 2	RETAIN Objective 2 AND AMEND PPC1 to ensure social, economic and cultural well-being is maintained.	Support in part Oppose in part	FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>undertaken at a rate that enables and provides for social, economic and cultural well-being.</p> <p>FFNZ considers this needs to go beyond simply maintaining social, economic and cultural well-being.</p>
Raukawa Charitable Trust Submitter ID: 74073	PC1-10600	Objective 2	<p>AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u>, to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u>."</p>	<p>Oppose in part</p> <p>Support in part</p>	<p>FFNZ supports clarity that prosperity is provided for. However, FFNZ considers that all members of society and all wellbeings ought to be considered, not just River iwi.</p> <p>FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.</p>
Ravensdown Limited Submitter ID: 74058	PC1-10097	Objective 2	<p>RETAIN the overall intent of Objective 2 while AMENDING it to read: "...economy benefit from the <u>maintenance</u>, restoration and/or <u>protection</u> of water quality in the Waikato River Catchment, <u>in a way and at a rate</u> which enables..."</p>	Support in part	<p>FFNZ supports clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing).</p> <p>FFNZ considers that the word "maintenance" is consistent with the NPS-FM and appropriate.</p>
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11093	Objective 2	<p>AMEND Objective 2 to read as follows (or similar to address reason for submission point): "<u>Waikato and Waipā communities are able to provide for their social,</u></p>	Support in part	<p>FFNZ supports clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>economic and cultural well-being in the short term (10 years) and long term (80 years), recognising that the Waikato and Waipā communities and their economy may ultimately benefit from the restoration and protection of water quality in the Waikato River catchment. This in turn will which enables the people and communities to continue to provide for their social, economic and cultural well-being."</u>		improvements have to be those that provide for social, economic and cultural wellbeing). FFNZ agrees that both the short term and long term needs to be considered and enabled and provided for.
South Waikato District Council Submitter ID: 72892	PC1-4031	Objective 2	RETAIN Objective 2.	Oppose in part	FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.
Spectrum Dairies Limited Partnership Submitter ID: 73958	PC1-2721	Objective 2	AMEND PPC1 to provide a greater emphasis on understanding that the economic effects of imposing a rule may affect achievement of the objective AND AMEND to find a pathway for farmers to address the environmental issues whilst still being capable of operating a viable and healthy business.	Support	FFNZ agrees that the economic effects must be taken into account and the most efficient option adopted. FFNZ considers that the financial implications for farmers needs to be taken into account, including when assessing the appropriate mitigation options in tailored FEPs.
Stark, Steven and Theresa Submitter ID: 73721	PC1-5033	Objective 2	AMEND Objective 2 to read: "Social, Economic and Cultural well-being is continuously maintained in the long term . Where there are	Support in part	FFNZ agrees that economic impacts must be taken into account and supports public funding for public good.

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			<u>negative economic impacts for the public good, public funding must be supplied or words to that effect."</u>		
Stevenson Resources Limited Submitter ID: 73732	PC1-5023	Objective 2	AMEND Objective 2 to read: "Objective 2: Social, economic and cultural well-being...Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment, <u>which and the restoration and protection is undertaken in a way and at a rate that enables the people and communities to continue to provide for their social, economic and cultural well-being."</u>	Support in part	FFNZ supports clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing).
Taupo District Council Submitter ID: 74207	PC1-8098	Objective 2	RETAIN the intent of Objective 2.	Oppose in part	FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11772	Objective 2	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for	Oppose in part Support in part	FFNZ supports clarity that prosperity is provided for. However, FFNZ considers that all members of society and all wellbeings ought to be considered, not just River iwi. FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> ."		this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8220	Objective 2	AMEND Objective 2 to read: "Objective 2: <u>The restoration, protection and enhancement of water quality contributes to social, economic and cultural well-being</u> Social, economic and cultural well-being is maintained in the long term"	Oppose	FFNZ does not consider that the purpose of the objective is to confirm that restoration of water will enable or contribute to social, economic and cultural well-being. FFNZ considers that these are factors that need to be weighed and that instead the rate of improvement needs to enable and provide for social, economic and cultural well-being
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10267	Objective 2	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> ."	Oppose in part Support in part	FFNZ supports clarity that prosperity is provided for. However, FFNZ considers that all members of society and all wellbeings ought to be considered, not just River iwi. FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3248	Objective 2	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities,	Oppose in part Support in part	FFNZ supports clarity that prosperity is provided for. However, FFNZ considers that all members of society and all wellbeings ought to be considered, not just River iwi. FFNZ considers that Objective 2 requires clarification that social, economic and cultural

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> ."		wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.
Waikato Environment Centre Submitter ID: 73436	PC1-6233	Objective 2	AMEND Objective 2 to recognise the potential off-sets to the costs of change, and the potential economic benefits, that will assists in limiting any social disruption.	Oppose	While FFNZ supports offsetting in principle, FFNZ considers that the economic costs need to be taken into account and does not agree that offsetting will turn these into benefits or reverse a conclusion that PC1 will impose significant economic and social cost.
Waikato Regional Council Submitter ID: 72890	PC1-2989	Objective 2	RETAIN Objective 2.	Oppose in part	FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.
Waipa District Council Submitter ID: 67704	PC1-3158	Objective 2	RETAIN Objective 2.	Oppose in part	FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.

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Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11262	Objective 2	AMEND Objective 2 to read: "Objective 2: Social, economic and cultural well-being is <u>recognised and maintained</u> in the long term... Waikato and Waipā communities and their economy <u>experience measurable benefits</u> from the <u>maintenance, restoration and/or protection</u> as relevant of water quality in the Waikato River catchment..."	Support in part	FFNZ supports the addition of the word "maintenance" (which is consistent with the NPS-FM) and clarification that benefits must be measurable and tangible. However, FFNZ has concerns that Objective 2 needs further clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing).
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2078	Objective 2	RETAIN Objective 2.	Oppose in part	FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.
Waitomo District Council Submitter ID: 73688	PC1-10314	Objective 2	RETAIN Objective 2.	Oppose in part	FFNZ considers that Objective 2 requires clarification that social, economic and cultural wellbeing are provided for and enabled (and without implying that water quality improvements will enable this i.e. the water quality improvements have to be those that provide for social, economic and cultural wellbeing). This means that the rate of maintenance, restoration and/or protection is undertaken at a rate that enables and provides for social, economic and cultural well-being.

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Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-9502	Objective 3	AMEND Objective 3 to make PPC1's timeframe 50 years with a short term target of 20% reduction in emissions.	Oppose	FFNZ is concerned that the 80 year targets are not achievable on the basis of technology and are based on flawed assumptions. The 10 year targets will impose significant costs (including loss of value add of \$193m and loss of 1,880 jobs). FFNZ strongly opposes any steps to make the targets more stringent or difficult to achieve or impose greater cost on the community.
A S Wilcox & Sons Ltd Submitter ID: 73142	PC1-4307	Objective 3	AMEND PPC1 to provide flexibility to land managers seeking to achieve reductions collaboratively at a catchment or sub-catchment scale AND AMEND to ensure all four contaminants are given equal weighting when assessing contaminant reductions.	Support	FFNZ supports a sub-catchment approach and the use of non-regulatory sub-catchment management plans to coordinate multiple property and/or whole of catchment actions. FFNZ supports an approach that is consistent across all four contaminants and not weighted to any one contaminant (unless that is a "hot spot" or more of an issue for a particular sub-catchment).
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6100	Objective 3	AMEND Objective 3 as set out below, or such alternative wording in order to address the reasons for submission: " Actions put in place and Changes to land use and water management are implemented by 2026 <u>which</u> reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, <u>and</u> are sufficient to <u>eventually</u> achieve ten percent of the required change between current water quality and the 80-year water quality attribute targets in Table 3.11-1. A ten percent change towards the long term water quality improvements is indicated by the short term water quality attribute targets in Table 3.11-1."	Support in part	FFNZ supports clarification that the actions do not need to be put in place prior to 2026 (which FFNZ considers is unrealistic e.g. for those that only have to obtain their FEP by 2026). FFNZ agrees that they will eventually be sufficient to achieve 10% of the change but will not be sufficient until fully implemented.

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Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10809	Objective 3	<p>AMEND the heading of Objective 3 to read: "Short-term improvements in water quality in the first stage of restoration and protection water quality for each sub-catchment and Freshwater Management Unit <u>as required by the Vision and Strategy</u>" AND AMEND the explanatory narrative to read: "Actions put in place and implemented by 2036 to reduce discharges of nitrogen, phosphorous, sediment and microbial pathogens, have achieved thirty percent of the required change between current water quality and the 80 year water quality attribute targets in Table 3.11-1 <u>once this Plan has been operative for 20 years.</u>" AND AMEND to define and refine short term targets AND AMEND Table 3.11-1 to include short-term attribute targets for all sites AND AMEND Table 3.11-1 to include a range of attributes and attribute targets that enable an accurate characterisation of water quality and ecosystem health AND that ensure freshwater resources are sustainably managed, provide for the habitat of trout and indigenous fish and the significant values of wetlands, AND that measure progress toward</p>	Oppose in part	<p>FFNZ considers that the actions are required by the NPS-FM and not just the V&S.</p> <p>FFNZ is not sure what is meant by the 20 year date but does not support more stringent requirements than the 10 year targets.</p> <p>FFNZ agrees that Table 3.11-1 ought to include short term targets but does not agree that it should include 80 year targets or that it should include additional targets for reasons including that the 80 year targets are based on flawed assumptions.</p> <p>FFNZ considers that the economic, social and cultural effects need to be taken into account and not just ecosystem health.</p> <p>FFNZ does not support the amendments the submitter proposes to Table 3.11-1 which will unlikely impose net environmental benefit but will likely impose significant economic cost.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			outcomes and enable reviews to assess the effectiveness of PPC1 AND AMEND the Table 3.11-1 numerical 80-year targets to give effect to the water quality objectives of the Vision and Strategy AND AMEND Table 3.11-1 to adopt the relief sought in Appendix 1 of the submission (pages 66 to 69) for rivers and streams, and add appropriate indicators for lakes and wetlands.		
Bailey, James Submitter ID: 73926	PC1-4796	Objective 3	AMEND Objective 3 to replace the 'staged' approach with an 'Adaptive Management' approach to managing nitrogen and all contaminants AND AMEND PPC1 to recognise Land Use Suitability and Natural Capital as the basis of nitrogen management AND AMEND to enable transition toward the Vision and Strategy with Land Use Suitability as a starting point and using Adaptive Management as our understanding develops, reviewing and adapting through subsequent plan changes.	Support in part Oppose in part	FFNZ supports a stage approach. It supports adaptive management provided this is not based on a precautionary approach and is instead based on taking reasonable actions now and imposing additional targets or revising targets as science and other information changes. FFNZ does not support nitrogen allocation for reasons including that there is no reliable and equitable way to allocate nitrogen. FFNZ considers that it is premature and inappropriate to determine that allocation is required and that it should be based on LUS.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6569	Objective 3	ADOPT as notified Objective 3. AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	Oppose in part	FFNZ considers that Objective 3 requires amendment to reflect the NPS-FM (i.e. maintain) and to remove reference to the 80 year targets.
Balle Bros Group Submitter ID: 67834	PC1-11392	Objective 3	AMEND Objective 3 to read: "Objective 3: Short-term improvements in water quality in the first stage of <u>maintenance</u> restoration	Support in part	FFNZ agrees that the word "maintain" is important and gives effect to the FFNZ. FFNZ agrees that only where relevant should sites be improved (i.e.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>and protection of water quality for each sub-catchment and Freshwater Management Unit...</p> <p>...Actions put in place and implemented by 2026 to <u>maintain or reduce</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>where relevant</u>, are sufficient to achieve ten percent of the required change between current water quality and the 80-year water quality attribute targets in Table 3.11-1. A ten percent change towards the long term water quality improvements is indicated by the short term water quality attribute targets in Table 3.11-1"</p> <p>AMEND PPC1 to remove the requirement for a Nitrogen Reference Point.</p>	Oppose in part	<p>there should not be a presumption that all sites must be improved).</p> <p>FFNZ considers that the 80 year targets ought to also be deleted from Objective 3 for reasons including that they are based on flawed assumptions.</p> <p>FFNZ supports the NRP provided it is not used to grandparent nitrogen and is used as a reference point only.</p>
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11482	Objective 3	<p>AMEND Objective 3 so that it provides for and enables management approaches tailored to the sub-catchment unit or waterbody and which specifically focus on the issues identified for that waterbody (i.e. in some catchments it may be Nitrogen but in others it may be sediment).</p> <p>AND DELETE reference to 10 percent of the required change.</p> <p>AND AMEND Table 3.11-1 so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of</p>	Support in part Oppose in part	<p>FFNZ supports a sub-catchment approach that focuses on the particular contaminant that is an issue.</p> <p>FFNZ has concerns with the 80 year targets, including the assumptions and the 10 year targets are derived from these. Accordingly, if there was a better way to characterise them FFNZ would support them.</p> <p>FFNZ agrees that the targets in Table 3.11-1 need to recognise economic and social wellbeing.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications. AND AMEND Objective 3 by extending timeframes to longer than 10 years, preferably 30 years.		FFNZ agrees that the 10 year targets ought to be extended due to the significant economic and social cost they impose./
Buckley, Peter Ross Submitter ID: 71423	PC1-1372	Objective 3	RETAIN Objective 3 and the 10% achievement of long-term water quality targets by 2026. AND DELETE Nitrogen Reference Points from the rules. AND ADOPT a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan.	Support in part Oppose in part	FFNZ support setting short term targets but considers they should be 10 years from at least the date submissions closed on Variation 1 and considers that 10% is a suitable target only in the absence of a more appropriate measure (noting FFNZ has concerns with the 80 year targets and the 10 year targets are derived from these). FFNZ supports a sub-catchment approach. FFNZ supports tailored FEPs that take into account things like resources reasonably available to the farmer and the other factors set out in FFNZ's MPA framework as set out in its submission on Variation 1.
Cameron, Bruce Submitter ID: 60603	PC1-6208	Objective 3	RETAIN the 10% achievement of the long term water quality targets AND AMEND PPC1 to remove the Nitrogen Reference Point AND ADOPT a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to	Support in part Oppose in part	FFNZ support setting short term targets but considers they should be 10 years from at least the date submissions closed on Variation 1 and considers that 10% is a suitable target only in the absence of a more appropriate measure (noting FFNZ has concerns with the 80 year targets and the 10 year targets are derived from these). FFNZ supports a sub-catchment approach. FFNZ supports tailored FEPs that take into account things like resources reasonably available to the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			be made through a tailored Farm Environment Plan.		farmer and the other factors set out in FFNZ's MPA framework as set out in its submission on Variation 1.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10773	Objective 3	RETAIN Objective 3 as currently worded.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets.
DairyNZ Submitter ID: 74050	PC1-10168	Objective 3	AMEND Objective 3 to read: "Objective 3: Ten percent short-term improvements in water quality as the first stage of achieving <u>Objective 1 restoration and protection of water quality for each sub-catchment and Freshwater Management Unit</u> ... Actions put in place and implemented by 2026... of the required change between current water quality <u>in 2016</u> , and the 80-year.... the short term water quality attribute^ targets^ <u>for each monitoring site listed in Table 3.11-1.</u> " AND AMEND Objective 3 to clarify that Table 3.11-1 is a list of existing water quality monitoring sites.	Support in part Oppose in part	While FFNZ has concerns with the 80 year numeric targets, it supports the 10 year targets in principle and in the absence of a better metric (as a means of demonstrating progress in the first 10 years). FFNZ supports the proposed reference to Objective 1 but only if that objective is amended as set out in FFNZ's submission on Variation 1. FFNZ agrees that clarification of current water quality as being in 2016 is helpful (particularly given the 2 year delay that has now occurred). FFNZ does not have an issue with clarifying each monitoring site but does not support the 80 year numeric targets.
Department of Conservation Submitter ID: 71759	PC1-10540	Objective 3	AMEND Objective 3 so that 10 year targets for water quality improvement be set for lakes using existing available expertise and models to prioritise those lakes to achieve a 20% improvement within 10 years. AND AMEND PPC1 to include the management of discharges of contaminants from point sources.	Oppose	FFNZ considers it inappropriate to adopt 10 year targets for lakes given the information gaps and lack of science. FFNZ supports an approach that considers the issues and works with the community to set targets as provided for in method 3.11.4.4. FFNZ considers that a 20% improvement in 10 years is unrealistic and will impose significant cost for no net benefit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					FFNZ agrees that diffuse and point source discharges ought to be managed.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9702	Objective 3	AMEND Objective 3 to read: "Actions put in place to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to water</u> , are sufficient to achieve <u>at least</u> ten percent of the required change between current water quality and the 80-year water quality attribute targets in Table 3.11-1..."	Support in part Oppose in part	FFNZ agrees that it is the discharge to water that ought to be managed but does not agree to a more stringent obligation (which would be the effect of "at least 10%"), particularly when 10% in the first 10 years imposes significant cost (including loss of value add of \$193m and loss of 1,880 jobs).
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10459	Objective 3	AMEND Objective 3 to read: "...Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve ten percent of the required change between current water quality and the desired 80-year water quality attribute^ targets^ <u>states</u> in Table 3.11-1. A ten percent change towards the long term <u>desired</u> water quality improvements <u>states</u> is indicated by the short term water quality attribute^ targets^ <u>states</u> in Table 3.11-1."	Support in part Oppose in part	FFNZ agrees that clarification is required to adopt consistent terminology with NPS-FM. FFNZ concerned that the 10 year targets will impose significant cost and that ought to be addressed. FFNZ agrees that it ought to be the desired water quality state that are aimed for.
Fulton Hogan Limited Submitter ID: 74048	PC1-10741	Objective 3	AMEND Objective 3 to read: "...sediment and microbial pathogens, are sufficient to achieve ten percent of the required change between current water quality and the 80-year <u>desired</u> water quality attribute^ targets^ <u>states</u> in Table 3.11-1. A ten percent change towards the long term <u>desired</u> water quality	Support in part Oppose in part	FFNZ agrees that clarification is required to adopt consistent terminology with NPS-FM. FFNZ concerned that the 10 year targets will impose significant cost and that ought to be addressed. FFNZ agrees that it ought to be the desired water quality state that are aimed for.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			states improvements is indicated by the short term water quality attribute states ^targets^ in Table 3.11-1."		
GBC Winstone Submitter ID: 73992	PC1-2866	Objective 3	AMEND Objective 3 to read: "Actions put in place and... sediment and microbial pathogens, are sufficient to achieve ten percent... 80-year <u>desired water quality states attribute targets</u> in Table 3.11-1. A ten percent change... long term <u>desired water quality states improvements</u> is indicated by the... attribute <u>state targets</u> in table 3.11-1."	Support in part Oppose in part	FFNZ agrees that clarification is required to adopt consistent terminology with NPS-FM. FFNZ concerned that the 10 year targets will impose significant cost and that ought to be addressed. FFNZ agrees that it ought to be the desired water quality state that are aimed for.
Hamilton City Council Submitter ID: 74051	PC1-10211	Objective 3	AMEND Objective 3 to read: "Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, are <u>Changes to water management and land use</u> sufficient to achieve, eventually, ten percent of the required change between current water quality and the 80 year water quality attribute targets in Table 3.11-1. A ten percent change towards the long term water quality improvements is indicated by the short term water quality attribute targets in Table 3.11-1 <u>are implemented by 2026.</u> "	Support in part	FFNZ agrees to the removal of timeframes and agrees that water management and land use management ought to eventually achieve the desired targets. However, FFNZ does not support the 80 year numeric targets (for reasons including that they are based on flawed assumptions) and does not agree that the targets in Table 3.11-1 ought to be achieved in 2026.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5374	Objective 3	AMEND Objective 3 so that improvements are required now to set the region on a firm trajectory toward achieving the 80 year goals, with measurable improvements in the first ten years and implementation of	Oppose in part	FFNZ is concerned that the proposal to put the region on a "firm trajectory" will impose even more stringent obligations and significant cost. FFNZ considers that a downward trajectory in contaminants ought to be adopted but that should

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			actions that are aligned with the long term goals.		reasonably take into account the likely costs. FFNZ does not support the 80 year numeric targets.
Hill Country Farmers Group Submitter ID: 73321	PC1-7496	Objective 3	AMEND Objective 3 to clarify now what will be required of farmers to achieve 80 year targets.	Oppose in part	FFNZ does not support 80 year numeric targets. It is concerned that specifying what is required now will result in them becoming entrenched in the plan change. It prefers an approach that undertakes a stocktake in 10 years time when more information and science is available.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-9945	Objective 3	AMEND Objective 3 to read: "... A ten percent change towards the long term water quality attribute improvements is indicated by the short term water quality attribute targets in Table 3.11-1 <u>or achievement of the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX.</u> " For the purpose of this relief the submitter has produced a 10-year Sub-catchment Load Target Table (Schedule 1C Table XX) and attached it to proposed relief as part of a new Schedule 1C. As an alternative where it is mentioned in this submission, it could be inserted as a new part of Table 3.11-1.	Oppose	FFNZ does not support adoption of a contaminant load for reasons including that this involves allocating to a sub-catchment level, there is insufficient information and science, the 80 year targets are based on flawed assumptions and this will likely impose significant cost for no net benefit.
J Swap Ltd Submitter ID: 71618	PC1-6406	Objective 3	AMEND Objective 3 as follows - "Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve ten percent of the required change between current water quality and the 80-year	Support in part Oppose in part	FFNZ agrees that clarification is required to adopt consistent terminology with NPS-FM. FFNZ concerned that the 10 year targets will impose significant cost and that ought to be addressed.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			desired water quality states attribute targets in Table 3.11-1. A ten percent change towards the long term desired water quality states improvements is indicated by Objective 3 the short term water quality attribute targets in Table 3.11-4.		FFNZ agrees that it ought to be the desired water quality state that are aimed for.
King Country Energy Limited Submitter ID: 60693	PC1-7819	Objective 3	RETAIN Objective 3. AND MAKE any similar amendments with like effect. AND MAKE any consequential amendments.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-9942	Objective 3	AMEND Objective 3 to ensure clarity in the application of water quality target provisions.	Support in part	FFNZ agrees that clarity about application would be helpful. However it does not support the 80 year numeric targets. FFNZ also considers that the targets ought to apply to all land uses.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9138	Objective 3	RETAIN Objective 3.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets.
Matamata-Piako District Council Submitter ID: 73419	PC1-3464	Objective 3	AMEND Objective 3 to read as follows: " <u>Changes to water management and land use are implemented by 2026 that achieve 10% of the required change between current water quality and the 80-year water quality attribute targets in Table 3.11.1 whilst recognising the 'lag' period for nutrient flows already in the system.</u> "	Support in part Oppose in part	FFNZ agrees that there will need to be changes in land and water management, but it does not agree that this will necessarily result in 10% changes being observed in the first 10 years. Therefore it supports recognising lags. FFNZ does not support the 80 year numeric targets.
Mercury NZ Limited	PC1-9511	Objective 3	RETAIN Objective 3.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73182					discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets.
Miraka Limited Submitter ID: 73492	PC1-8775	Objective 3	AMEND to clarify how measurement and monitoring will be undertaken (such as with respect to the 10 per cent of the required change by 2016) AND AMEND to ensure that sub-catchments are identified as Freshwater Management Units.	Support in part	FFNZ agrees that clarity is needed about measuring and monitoring. FFNZ agrees that the FMUs are unlikely to be the appropriate spatial scale for freshwater management but considers the sub-catchments may be too small. It supports grouping related sub-catchments (so the scale will vary from area to area).
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4607	Objective 3	RETAIN Objective 3.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets.
New Zealand Steel Ltd Submitter ID: 73790	PC1-3697	Objective 3	AMEND Objective 3 to clarify application of water quality target provisions.	Support in part Oppose in part	FFNZ agrees that clarity is needed about measuring and monitoring. However, FFNZ does not support the 80 year targets.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11825	Objective 3	RETAIN Objective 3.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6370	Objective 3	AMEND Objective 3 to be consistent with the alternative approach in the submission [to regulate land use on the basis of the Best Practicable Option and work toward allocation on a land use suitability approach] [overview of the alternative approach in Table 2 of submission] AND OR AMEND to	Support in part Oppose in part	In principle, FFNZ supports the regulation of land use by BPO. However, it does not support the submitter's definition of BPO which is akin to input controls. FFNZ supports the definition of BPO based on MPA as set out in its submission on Variation 1. FFNZ considers that both point source and non-point source discharges ought to be managed

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			read: "Actions put in place immediately and implemented by 2026 to reduce <u>non-point source</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve <u>Objective 1</u> . [as redrafted] ten percent of the required change between current water quality and the 80 year water quality towards the long term water quality improvements is indicated by the short term water quality attribute targets in Table 3.11-1."		
Pouakani Trust Submitter ID: 73785	PC1-6280	Objective 3	RETAIN Objective 3. AND AMEND to provide clarification as to how appropriate measurement and monitoring will be undertaken and reported. AND AMEND to ensure that sub-catchments are identified as the FMUs.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets. FFNZ agrees that clarity is needed about measuring and monitoring. However, FFNZ does not support the 80 year targets. FFNZ agrees that the FMUs are unlikely to be the appropriate spatial scale for freshwater management but considers the sub-catchments may be too small. It supports grouping related sub-catchments (so the scale will vary from area to area).
Primary Land Users Group Submitter ID: 71427	PC1-11132	Objective 3	AMEND to adopt a sub-catchment management approach to ensure collaborative and fair allocation of the resources within the region, to achieve practicable reductions in	Support in part	FFNZ supports a sub-catchment approach. However, it does not support the allocation of contaminants.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			discharges of contaminants across the Waikato and Waipā catchments.		
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7773	Objective 3	RETAIN Objective 3.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10544	Objective 3	RETAIN Objective 3.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets.
Ravensdown Limited Submitter ID: 74058	PC1-10099	Objective 3	RETAIN the overall intent of Objective 3 while AMENDING it by adding: <u>"Note: the ten percent change required by this objective is an overall improvement in water quality. It may not be feasible for each attribute in Table 3.11-1 to be reduced by ten percent."</u>	Support in part	FFNZ agrees that the objective ought to be a 10% improvement in water quality and not a 10% improvement in every attribute measured at every site. Such an approach may not be feasible, practical or reasonably affordable and may not result in a noticeable improvement in water quality.
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5634	Objective 3	REMOVE the timeframe in Objective 3. AND AMEND PPC1 to require best current practices to be used for all polluting activities. AND AMEND PPC1 to require the most polluting activities be subject to the greatest mitigation requirements, penalties, oversight, research, measurement and regulation. Ensure however that there is room to innovate mitigations as new practices and methods develop.	Support in part Oppose in part	FFNZ does not support the 80 year numeric targets. It does not support changes to make the targets more stringent or the timeframes tighter. FFNZ supports a hot spot approach to focus on contaminants of greatest issue. It also supports robust science and information gathering.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11095	Objective 3	AMEND Objective 3 as set out below, or such alternative wording in order to address the reasons for submission: " Actions put in place and <u>Changes to land use and water management are implemented by 2026 which</u> reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, and are sufficient to eventually achieve ten percent of the required change between current water quality and the 80 year water quality attribute^ targets^ in Table 3.11-1. A ten percent changes towards the long term water quality improvements is indicated by the short term water quality attribute^ targets^ in Table 3.11-1."	Support in part	FFNZ supports clarification that the actions do not need to be put in place prior to 2026 (which FFNZ considers is unrealistic e.g. for those that only have to obtain their FEP by 2026). FFNZ agrees that they will eventually be sufficient to achieve 10% of the change but will not be sufficient until fully implemented.
South Waikato District Council Submitter ID: 72892	PC1-4032	Objective 3	REPLACE Objective 3 with: " <u>Changes to water management and land use are implemented by 2026 that achieve 10% of the required change between current water quality and the 80-year water quality attribute targets in Table 3.11-1 in the period desirably to 2036.</u> "	Support in part Oppose in part	FFNZ agrees that there will need to be changes in land and water management, but it does not agree that this will necessarily result in 10% changes being observed in the first 10 years. It supports providing more time such as 2036 (as long as it is 10% by 2036 not the 80 year targets by 2036).
Spectrum Dairies Limited Partnership Submitter ID: 73958	PC1-2739	Objective 3	Objective 3: CONSIDER undertaking more work to assess existing information to ensure PPC1 measures and assumptions are correct.	Support	FFNZ supports further work to improve assumptions and information base (particularly in respect of targets and means of measuring progress towards targets).
Stark, Steven and Theresa Submitter ID: 73721	PC1-5048	Objective 3	AMEND Objective 3 by substituting Table 3.11-1 with the minimum standards as set out in Ministry for the Environment's Clean Water	Support in part	FFNZ supports the adoption of an approach consistent with the NOF attributes provided that this is not more stringent than what is proposed in PC1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			document published February 2017 and within the National Objectives Framework in the National Policy Statement for Freshwater Management 2014. DELETE the entire paragraph AND REPLACE text to read: "Put in place measuring and monitoring mechanisms to 2026 to inform the reduction of discharges, where needed, of nitrogen, phosphorus, sediment and microbial pathogens." AND AMEND by allowing movement of water quality within a band.		FFNZ supports further information gathering and monitoring to 2026 to better understand the catchment and water quality. FFNZ agrees that PC1 ought to provide for movement within a band and not require all attribute numbers to reduce everywhere.
Stevenson Resources Limited Submitter ID: 73732	PC1-5024	Objective 3	AMEND Objective 3 to read: "Objective 3:...Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve ten percent of the required change between current water quality and the 80-year desired water quality states attribute targets in Table 3.11-1. 1. A ten percent change towards the long term desired water quality states improvements is indicated by Objective 3 the short term water quality attribute targets in Table 3.11-4."	Support in part Oppose in part	FFNZ agrees that clarification is required to adopt consistent terminology with NPS-FM. FFNZ concerned that the 10 year targets will impose significant cost and that ought to be addressed. FFNZ agrees that it ought to be the desired water quality state that are aimed for.
Taupo District Council Submitter ID: 74207	PC1-8100	Objective 3	RETAIN the intent of Objective 3.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					quality is being maintained and to remove reference to 80 year numeric targets.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11774	Objective 3	RETAIN Objective 3.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8221	Objective 3	AMEND Objective 3 to read: "Objective 3: <u>Immediate improvements are achieved in water quality in each sub-catchment and Freshwater Management Unit</u> Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit " AND AMEND the explanation to read: "Actions are put in place and implemented by 2026 <u>immediately</u> to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve ten percent of the required change between current water quality and the 80-year water quality attribute targets in Table 3.11-1. A ten percent change towards the long term water quality improvements is indicated by the short term water quality attribute targets in Table 3.11-1" "	Oppose	FFNZ is concerned that the 10 year targets will impose significant social and economic cost on the community and that they are based on flawed assumptions (including a requirement to improve numeric attribute states everywhere, even where they are in the A band). FFNZ is very concerned that making this even more stringent i.e. requiring immediate improvement everywhere, will cause significant cost and hardship for no net benefit. FFNZ does not support requiring immediate actions to reduce contaminants. It is concerned that this would impose significant cost for no net benefit, would not result in a staged approach and would not recognise reasonable lags as well as practical delays in identifying and implementing mitigations.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10268	Objective 3	RETAIN Objective 3.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					quality is being maintained and to remove reference to 80 year numeric targets.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3297	Objective 3	RETAIN Objective 3.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets.
Waikato Dairy Leaders Group Submitter ID: 74049	PC1-10909	Objective 3	RETAIN the intent of Objective 3 as set out in "Reasons for adopting Objective 3" AND RETAIN the Objective 3 statement: 'Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve ten percent of the required change between current water quality and the 80 year water quality attribute^ <u>targets</u> ^ in Table 3.11-1'.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets. FFNZ does not support the 80 year targets and considers that they are not targets or limits set under the NPS-FM.
Waikato Regional Council Submitter ID: 72890	PC1-2991	Objective 3	RETAIN Objective 3.	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets.
Waipa District Council Submitter ID: 67704	PC1-3159	Objective 3	AMEND Objective 3 to read: "Short term Improvements <u>to water (ie. By 2026)...</u> "	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets. FFNZ also considers that the 10 year target ought to be from the date of submissions on Variation 1 to recognise the 2 year delay since notification of PC1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11265	Objective 3	AMEND Objective 3 to read: "Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens are sufficient to achieve <u>an overall</u> ten percent of the required change between current water quality and the 80-year water quality attribute targets in Table 3.11-1. A ten per cent change towards the long term water quality improvements is indicated by the short term water quality attribute targets in Table 3.11-1 <u>within each sub-catchment.</u> "	Support in part	FFNZ agrees that the focus ought to be on 10% of the journey overall and not a 10% improvement in every contaminant in every sub-catchment. This would recognise and provide for maintenance of water quality within a band and recognise that overall water quality is being considered (as opposed to isolated numeric measures for specific contaminants).
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2079	Objective 3	AMEND in Objective 3 FMU's to be comprised of sub-catchments that are grouped together by similar physical attributes.	Support	FFNZ is also concerned that the FMU is not the appropriate spatial scale for managing freshwater. FFNZ supports grouping related sub-catchments and managing water quality at that scale.
Waitomo Catchment Trust Board Submitter ID: 73124	PC1-7952	Objective 3	AMEND PPC1 to ensure that all discharges to contact recreation streams are considered as point source discharges [inputs] and monitored as such on a case-by-case basis. AND AMEND PPC1 to ensure that grazing adjacent to waterways and on steep contour is at least a controlled activity and where necessary a restricted discretionary activity. AND AMEND PPC1 to promote edge of field mitigation on farms bordering contact recreation streams.	Oppose	FFNZ considers that it is not appropriate, reasonably or practical to treat discharges to contact recreation streams as point source discharges. FFNZ considers a reasonable consenting pathway needs to be provided for farming activities. It does not support a blanket requirement that grazing next to waterways and on steep contour is a controlled or RD activity and considers that such activities can be provided for through FEPs tailored to the particular critical source areas on each property. FFNZ supports edge of field mitigations as long as it is non regulatory and part of coordinated sub-catchment management plans.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND PPC1 to ensure that robust, regular monitoring is mandatory where consented activities take place.		FFNZ supports monitoring but considers a reasonable monitoring and enforcement regime ought to be adopted to recognise the nature of diffuse discharges i.e. you cannot measure them and are relying on models and assumptions to estimate them.
Waitomo District Council Submitter ID: 73688	PC1-10315	Objective 3	AMEND Objective 3 to read: "Short term Improvements to water <u>(ie. By 2026)</u> ..."	Oppose in part	FFNZ considers that amendments are needed to Objective 3 to clarify that matters including that discharges are to be managed (not reduced), water quality is being maintained and to remove reference to 80 year numeric targets. FFNZ also considers that the 10 year target ought to be from the date of submissions on Variation 1 to recognise the 2 year delay since notification of PC1.
A S Wilcox & Sons Ltd Submitter ID: 73142	PC1-4308	Objective 4	AMEND Objective 4 to recognise that PPC1 is transitional, to provide time to develop the tools required to more efficiently allocate responsibility for achieving contaminant reduction targets in the long-term.	Support in part	FFNZ agrees that PC1 ought to be transitional and as such should not lock in long term targets. Not only is time required to also tools to make reductions but also time is needed to gather information and better understand the catchment and the likely reductions and water quality improvements required and the effects of various mitigations on water quality.
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6113	Objective 4	AMEND Objective 4 as follows: "A staged approach to <u>changing</u> e enables people and communities to provide for their <u>the management of land use and related diffuse discharges undertake</u> adaptive <u>enables people and communities to continue to provide</u> for their social, economic and cultural well-being in the short term (the	Support	FFNZ agrees that the staged approach ought to focus on what land management activities are needed to manage discharges (as opposed to a presumption of no land use change or a reduction of every discharge everywhere). FFNZ agrees that communities ought to be able to "continue" to do these activities.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			period to 2026) <u>and to continue to realise</u> the values and uses while: a. <u>considering the values and uses when</u> taking action to achieve the attribute targets for the Waikato and Waipā Rivers in Table 3.11-1; and b. recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed in order to meet Objective 1."		FFNZ agrees that eh values and uses ought to be linked into this policy and considered when assessing targets and required actions. FFNZ considers that it is premature to signal now that land use change or allocation will be required and agrees that "signalling anticipated future management ..." ought to be deleted.
Bailey, James Submitter ID: 73926	PC1-9018	Objective 4	AMEND Objective 4 to replace the 'staged' approach with an 'Adaptive Management' approach to managing nitrogen and all contaminants AND AMEND PPC1 to recognise Land Use Suitability and Natural Capital as the basis of nitrogen management AND AMEND to enable transition toward the Vision and Strategy with Land Use Suitability as a starting point and using Adaptive Management as our understanding develops, reviewing and adapting through subsequent plan changes.	Support in part Oppose in part	FFNZ supports a staged approach. It would support an adaptive management approach if that was not based on a precautionary approach but instead based on developing more precise targets, mitigations and obligations once the catchment and potential mitigations and costs/benefits were better understood. FFNZ considers that it is premature to allocate nitrogen or to determine the allocation approach. FFNZ does not support the use of LUS at this stage, when it is poorly understood or defined and when the catchment and mitigations etc are poorly understood.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6574	Objective 4	AMEND Objective 4 to read: "A staged approach to change enables people and communities to undertake <u>adaptive implement management responses (including those set out in Implementation Methods set out under section 3.11.4)</u> to continue to provide..."	Support in part	FFNZ supports the linkage to the methods (provided they are amended as proposed in FFNZ's submission on Variation 1). However, FFNZ considers that Objective 4 needs further changes to address information gaps and recognise and provide flexibility for on farm management measures to respond to changes in various events or conditions.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.		
Balle Bros Group Submitter ID: 67834	PC1-11393	Objective 4	AMEND PPC1 to ensure the rule framework gives effect to Objective 4.	Support in part	FFNZ agrees that PC1 ought to adopt a staged, transitional and interim approach. However, FFNZ considers that Objective 4 needs further changes to address information gaps and recognise and provide flexibility for on farm management measures to respond to changes in various events or conditions.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11483	Objective 4	ADD a NEW Objective to PPC1 which provides for people and community resilience, adaptive management, and sub-catchment approaches led by communities. AND DELETE from Objective 4 reference to the staged approach and future plan changes including increasing stringency in land use controls and requirements AND REPLACE with adaptive management Objectives and Policies. AND AMEND Objective 4 OR ADD a new Objective to PPC1 to give effect to the following intent: "People and community resilience / Te Whaingā 4: Te manawa piharau o te tangata me te hapori, and the <u>achievement of the Vision and Strategy for the Waikato River. Communities working together to sustainably manage land and water resources within their sub-catchments, to protect the values for</u>	Support in part Oppose in part	FFNZ supports a sub-catchment approach but does not support the creation of autonomous communities or the allocation of contaminants to catchment collectives (or similar). FFNZ supports staged and transitional approach but agrees that PC1 should not signal future allocation or management for reasons including it is premature to determine that allocation is necessary or appropriate or to determine the allocation approach. FFNZ supports providing a longer timeframe to meet 10 year targets that more reasonably took into account the significant cost and the implications for water quality. FFNZ also agrees that required reductions ought to provide for community resilience and economic wellbeing. FFNZ is not sure about what is intended by providing a pathway for individuals and communities to work together. If this means amendments to the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>freshwater, to maintain and where degraded improve water quality, and to protect and restore biodiversity, for generations to come."</u> AND AMEND Table 3.11-1 interim targets so that they apply at a longer time frame such as 30 years, for those parameters which are significantly over allocated now AND AMEND the interim targets so that they progressively reduce over allocation at a rate and scale which provides for people and community resilience including economic well-being. AND AMEND Table 3.11-1 and Objective 4 so that PPC1 provides a pathway for individuals and communities to work together to achieve the Vision and Strategy over the long term.</p>		<p>methods to enable and provide for coordinated sub-catchment actions, FFNZ would agree.</p>
<p>Buckley, Peter Ross Submitter ID: 71423</p>	<p>PC1-1376</p>	<p>Objective 4</p>	<p>RETAIN Objective 4 and the staged approach AND DELETE the Nitrogen Reference Point and land use change restrictions from the rules. AND ADOPT a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water gains to be</p>	<p>Support in part</p>	<p>FFNZ supports a staged approach (as opposed to requiring all improvements in first 10 years or immediately).</p> <p>FFNZ supports the NRP only if it is used as a reference point and not to allocate nitrogen.</p> <p>FFNZ supports a sub-catchment approach but does not support the creation of autonomous communities or the allocation of contaminants to catchment collectives (or similar).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			made, through a tailored Farm Environment Plan.		FFNZ supports tailored FEPs and flexibility to adjust actions in FEPs in response to things like climatic events, economic downturn, natural hazards etc.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10774	Objective 4	RETAIN Objective 4 as currently worded.	Oppose in part	FFNZ considers that amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
DairyNZ Submitter ID: 74050	PC1-10193	Objective 4	AMEND Objective 4 to read: "Objective 4: People and community resilience/... A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, and cultural well-being <u>and assist community resilience, while:...</u> "	Oppose in part	FFNZ has concerns that the addition of "assist community resilience" will water down the need to take into account social and economic costs and wellbeing and the significant cost that PC1 will impose.
Department of Conservation Submitter ID: 71759	PC1-10542	Objective 4	AMEND Objective 4 to remove the term 'continue'. AND AMEND the objective to remove uncertainty around 'further contaminant reductions' by implementing an allocation regime for contaminants based on current information and knowledge with the ability to amend this regime further information becomes available. AND AMEND clause (a) to require that at least intrinsic values are recognised and provided for. AND AMEND PPC1 to implement greater changes to the management of contaminant discharges in the short-term, through an allocation regime that recognises land type and	Oppose	FFNZ considers the use of the word "continue" is appropriate. FFNZ does not support allocation of contaminants for reasons including that there is no equitable and reliable way to allocate and there is no need to allocate. FFNZ considers that contaminants can be managed and water quality improved without allocation. FFNZ considers that allocation will likely impose significant cost for no net benefit. FFNZ does not support raising intrinsic values above others and considers paragraph (a) ought to refer to "values and uses". FFNZ considers that the proposed short term targets are too stringent and will impose significant economic and social cost. They are also based on

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			achieves a greater short term improvement in water quality.		flawed assumptions e.g. adopting the lake nitrogen measure which is more stringent than the river measure. FFNZ strongly opposes making these more stringent.
Farmers 4 Positive Change (F4PC) Submitter ID: 73355	PC1-10421	Objective 4	REMOVE the Objective 4 reference to a staged approach and future plan changes including increasing stringency in land use controls and requirements. ADD a NEW Objective which provides for people and community resilience, adaptive management, and sub-catchment approaches lead by communities.	Oppose in part Support in part	FFNZ supports a staged and transitional approach (as opposed to requiring all reductions immediately or within the 10 years or some other more stringent approach). FFNZ considers it is premature to signal what future plan changes ought to contain and considers that it is appropriate to undertake a stock take in 10years time and re-assess appropriate targets, actions and timeframes. FFNZ supports an approach that recognises and provides for community resilience and that adopts a sub-catchment approach (provided this is not based on autonomous sub-catchment committees or allocation of contaminants to sub-catchment committees). FFNZ would support an adaptive management approach if that was not based on a precautionary approach but instead based on developing more precise targets, mitigations and obligations once the catchment and potential mitigations and costs/benefits were better understood.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9703	Objective 4	AMEND Objective 4(b) to read: "recognising that further contaminant reductions <u>to water</u> will <u>may</u> be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1."	Support in part	FFNZ agrees that PC1 should not pre-determine what steps are required and that changing the word to "may" helps to clarify this. FFNZ also agrees that clarification that it is discharges to water that are relevant is helpful. However, FFNZ considers that further amendments are needed to Objective 4 as set out in its

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10468	Objective 4	AMEND Objective 4 to read: "...a) considering the values and uses identified in Section 3.11.1 when taking action to achieve Objectives 1 and 3 the attribute targets for the Waikato and Waipā Rivers in Table 41-4; and..."	Support in part	FFNZ supports clarification that the values and uses are referring to section 3.11.1 and would support reference to Objectives 1 and 3 provided they were amended as set out in FFNZ's submission on Variation 1. However, FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Fulton Hogan Limited Submitter ID: 74048	PC1-10743	Objective 4	AMEND Objective 4 to read: "...a) considering the values and uses identified in section 3.11.1 when taking action to achieve Objectives 1 and 3 the attribute targets for the Waikato and Waipā Rivers in Table 3-11-4; and..."	Support in part	FFNZ supports clarification that the values and uses are referring to section 3.11.1 and would support reference to Objectives 1 and 3 provided they were amended as set out in FFNZ's submission on Variation 1. However, FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
GBC Winstone Submitter ID: 73992	PC1-2879	Objective 4	AMEND Objective 4 to read: "A staged approach...a) considering the values and uses identified in section 3.11.1 when taking action to achieve Objectives 1 and 3the attribute targets for the Waikato and Waipā Rivers in Table 11-4; and.."	Support in part	FFNZ supports clarification that the values and uses are referring to section 3.11.1 and would support reference to Objectives 1 and 3 provided they were amended as set out in FFNZ's submission on Variation 1. However, FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					about filling information gaps and providing flexibility for mitigations in FEPs.
Genesis Energy Limited Submitter ID: 74052	PC1-8798	Objective 4	RETAIN Objective 4 (in same or similar form).	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Gleeson, Graeme B Submitter ID: 73800	PC1-6450	Objective 4	AMEND Objective 4 to ensure people and community resilience is provided for over the life of the plan. AMEND to clearly set out how PPC1 intends to achieve the 80-year outcomes. If this cannot be undertaken with confidence then establish an interim target (suggested 30 year). AND DELETE Objective 4(b) AND ADD a NEW objective that provides for community and individual resilience, management process that allow for adaptation and community-led sub-catchment approaches. AND DELETE reference to future plan changes and the need for further de-intensification, unless this pathway forward is well articulated, with clear details about what will happen and when.	Support in part Oppose in part	FFNZ agrees that community resilience ought to be provided for (and it should not just be limited to the next 10 years). FFNZ does not support the 80 year targets for reasons including that they are based on flawed assumptions. FFNZ considers it is premature to set out how the 80 year targets (or anything beyond 10 years) will be achieved. While FFNZ considers that paragraph b could remain (if the word "will" was substituted for "may") it would also support an approach that provided for a non regulatory sub-catchment approach and focused on community resilience. FFNZ agrees that this plan change should not pre-determine what happens in future plan changes and considers that it is premature to detail how this will happen.
Hamilton City Council Submitter ID: 74051	PC1-10226	Objective 4	AMEND Objective 4 to read as: "A staged approach to change <u>changing the management of discharges of contaminants</u> enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural	Support in part	FFNZ supports a staged approach that focuses on management of discharges and changes to management as opposed to focusing on not intensification and requiring every contaminant to reduce everywhere.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			well-being in the short term period to 2026, while; a. considering and continue to realise the values and uses for the Waikato and Waipā Rivers, when while; a. taking actions to achieve the attribute targets for the Waikato and Waipā Rivers in Table 3.11-1; and b. recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed in order to meet Objective 1."		FFNZ agrees that it is premature to signal future management approaches or to lock in the direction in the next plan change or to determine what will be required.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5377	Objective 4	RETAIN the reference to the staged approach in Objective 4. AMEND Objective 4 by clarifying that actions will be required to achieve Objective 1 targets and that these actions need to be implemented within the life of PPC1.	Support in part Oppose in part	FFNZ supports a staged and transitional approach (as opposed to requiring all reductions immediately or in the first 10 years). FFNZ does not support clarifying what actions are required because it considers that appropriate flexibility is required and a tailored approach will result in the greater environmental gain for lowest cost. FFNZ also considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10005	Objective 4	AMEND Objective 4 to read: "...a. considering the values and uses when taking action to achieve the attribute targets for the Waikato and Waipā Rivers in Table 3.11-1 <u>or achievement of the contaminant load</u>	Oppose in part	FFNZ does not support the allocation of contaminant loads for reasons including that it is premature and inappropriate to allocate contaminants and the 80 year targets are based on flawed assumptions so the loads are likely to be as well.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>reduction targets specified for each sub-catchment in Schedule 1C Table XX; and</u> b. recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1 <u>and</u> <u>c. recognising that this plan change is transitional, to provide time to develop the tools required to more efficiently allocate responsibility for achieving contaminant reductions targets in the long-term</u> d. <u>enabling the production of contaminant accounting frameworks that support robust measurement of progress to achieving the long-term and short-term target states for attributes and sub-catchment load limits by more accurately identifying property level responsibilities for contaminant reduction."</u></p>		<p>FFNZ supports a transitional and staged approach but it does not consider allocation is necessary and considers it is premature to signal allocation.</p> <p>FFNZ supports freshwater accounting but has concerns that by their nature diffuse discharges will be difficult to account for and does not support allocation to a property level. FFNZ instead supports management of diffuse discharges through tailored and proportionate FEPs with suitable flexibility.</p>
J Swap Ltd Submitter ID: 71618	PC1-6408	Objective 4	<p>AMEND Objective 4 as follows - "A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural well-being in the short term while: a) considering the values and uses <u>identified in section 3.11.1</u> when taking action to achieve <u>Objectives 1 and 3</u>the attribute targets for the</p>	Support in part	<p>FFNZ supports clarification that the values and uses are referring to section 3.11.1 and would support reference to Objectives 1 and 3 provided they were amended as set out in FFNZ's submission on Variation 1.</p> <p>However, FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Waikato and Waipā Rivers in Table 41-4; and recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1."		
King Country Energy Limited Submitter ID: 60693	PC1-7836	Objective 4	RETAIN Objective 4. AND MAKE any similar amendments with like effect. AND MAKE any consequential amendment.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPS.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-9944	Objective 4	RETAIN Objective 4.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPS.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9152	Objective 4	RETAIN Objective 4.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPS.
Matamata-Piako District Council Submitter ID: 73419	PC1-3468	Objective 4	AMEND Objective 4 to read as follows: " <u>A staged approach to land use change is managed to minimise the impacts of transition on the social, economic and cultural well-being of communities in the short term.</u> " AND AMEND the Reasons accordingly.	Support in part	FFNZ agrees that Objective 4 ought to provide for a staged and transitional approach that takes into account social, economic and cultural wellbeing. However, FFNZ considers it should not signal land use change and instead these words should be land management or similar
Mercury NZ Limited Submitter ID: 73182	PC1-9514	Objective 4	RETAIN Objective 4 particularly the reference to values and uses in Objective 4 (a).	Oppose in part	While FFNZ agrees there should be reference to the values FFNZ considers that further amendments are needed to Objective 4 as set out in its

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Miraka Limited Submitter ID: 73492	PC1-8807	Objective 4	RETAIN Objective 4.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4608	Objective 4	RETAIN Objective 4.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
New Zealand Steel Ltd Submitter ID: 73790	PC1-3698	Objective 4	RETAIN Objective 4.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11826	Objective 4	RETAIN Objective 4.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6389	Objective 4	AMEND Objective 4 to read: "...a. considering the values and uses when taking actions to achieve the attribute <u>short term goals</u> targets for the Waikato and Waipā Rivers in Table 3-11.1; and b. recognising that further contaminant reductions will be required <u>during the life of the plan and by subsequent regional plans</u> and signalling anticipated future	Support in part Oppose in part	FFNZ considers that it is helpful to refer to the values and to incorporate them into the objectives. FFNZ agrees that goals is a better word than targets. FFNZ does not agree that there should be signals about future management approaches in this plan change (without appropriate caveats).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			management approaches that will be needed to meet Objective 1." OR AMEND to ensure that Objective 4 is consistent with the alternative approach in the submission to regulate land use on the basis of the Best Practicable Option and work toward allocation on a land use suitability approach [An overview of the alternative approach can be found in Table 2 of submission].		In principle FFNZ supports an approach based on BPO but it does not support the input control basis proposed by this submitter and prefers the approach based on MPA as set out in FFNZ's submission on Variation 1.
Primary Land Users Group Submitter ID: 71427	PC1-11135	Objective 4	AMEND PPC1 rules to give effect to Objective 4.	Oppose in part	While FFNZ supports a staged approach (as opposed to implementing all changes in the first 10 years or immediately) FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7774	Objective 4	RETAIN Objective 4 AND AMEND PPC1 to better reflect Objective 4	Oppose in part	While FFNZ supports a staged approach (as opposed to implementing all changes in the first 10 years or immediately) FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10546	Objective 4	RETAIN Objective 4.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Ravensdown Limited Submitter ID: 74058	PC1-10100	Objective 4	RETAIN the intent of Objective 4 as currently written.	Oppose in part	While FFNZ supports a staged approach (as opposed to implementing all changes in the first 10 years or immediately) FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Rotorua Lakes Council Submitter ID: 73373	PC1-2468	Objective 4	<p>AMEND Objective 4 to read: "<u>A staged approach to changing the management of discharges of contaminants that enables people and communities to provide for their social, cultural and economic well-being for the period to 2016, while:</u></p> <ul style="list-style-type: none"> • <u>Restoring the values and uses for the Waikato and Waipā Rivers</u> • <u>Taking actions to achieve the attribute targets for the Waikato and Waipā Rivers in Table 3.11-1; and</u> • <u>Recognising that further reductions will be required by subsequent regional plans.</u>" <p>AND MAKE any consequential amendments.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>In principle, FFNZ supports the approach of staging management of discharges to enable communities to provide for their wellbeing while maintaining, protecting and restoring the health and wellbeing of the rivers.</p> <p>However, FFNZ has issues with the wording of the bullet points including “restoring” values (it should be achieving or balancing or something similar), FFNZ does not support the 80 year targets in table 3.11-1 and FFNZ does not support pre-empting future plan changes or management actions.</p>
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11096	Objective 4	<p>AMEND Objective 4 to read: "<u>A staged approach to changing enables people and communities to provide for their the management of land use and related diffuse discharges undertake adaptive enables people and communities to continue to provide for their social, economic and cultural well-being in the short term (the period to 2026) and to continue to realise the values and uses while:</u></p>	Support	<p>FFNZ agrees that the staged approach ought to focus on what land management activities are needed to manage discharges (as opposed to a presumption of no land use change or a reduction of every discharge everywhere).</p> <p>FFNZ agrees that communities ought to be able to “continue” to do these activities.</p> <p>FFNZ agrees that eh values and uses ought to be linked into this policy and considered when assessing targets and required actions.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>a. Considering the values and uses when taking actions to achieve the attribute^ targets^ for the Waikato and Waipā Rivers in Table 3.11-1; and</p> <p>b. Recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed in order to meet Objective 1."</p>		FFNZ considers that it is premature to signal now that land use change or allocation will be required and agrees that "signalling anticipated future management ..." ought to be deleted.
South Waikato District Council Submitter ID: 72892	PC1-4034	Objective 4	<p>AMEND Objective 4 to read: "A staged approach to <u>land use change</u> enables people and communities to undertake adaptive management to continue to provide for their is managed to minimise the impacts of transition on the social, economic and cultural well-being of communities in the short term." AMEND the reasons accordingly.</p>	Support in part Oppose in part	<p>While FFNZ supports in principle an approach based on adaptive management if this is not based on a precautionary approach and involves adding more details or more restrictions as more information and better science is available, FFNZ considers deleting this might provide greater clarity.</p> <p>FFNZ considers that the focus should be on land management and not on land use change.</p>
Stark, Steven and Theresa Submitter ID: 73721	PC1-5049	Objective 4	<p>AMEND Objective 4 by deleting Table 3.11-1 and substituting the minimum standards as set out in the Ministry for the Environment's Clean Water document published February 2017. AND AMEND by adding the following to Objective 4 to read as: "<u>Where there are negative economic impacts on landowners for the public good, public funding must be supplied.</u>" DELETE Clause B and require no further cost requirements on</p>	Support in part Oppose in part	<p>FFNZ supports the adoption of an approach consistent with the NOF attributes provided that this is not more stringent than what is proposed in PC1.</p> <p>FFNZ agrees that public funding ought to be provided for public good.</p> <p>FFNZ agrees that a reasonable horizon for cost and investment ought to be recognised and provided for.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			landowners for 25 years in order for them to afford the costs of significant investments required under PPC1.		
Stevenson Resources Limited Submitter ID: 73732	PC1-5025	Objective 4	AMEND Objective 4 to read: "A staged approach ... while: a) considering the values and uses identified in section 3.11.1 when taking action to achieve Objectives 1 and 3 the attribute targets for the Waikato and Waipā Rivers in Table 3.11-4; and..."	Support in part	FFNZ supports clarification that the values and uses are referring to section 3.11.1 and would support reference to Objectives 1 and 3 provided they were amended as set out in FFNZ's submission on Variation 1. However, FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Taupo District Council Submitter ID: 74207	PC1-8102	Objective 4	AMEND to clarify what the staged approach means, AND AMEND to clarify what is intended by the term 'short-term'.	Support in part	FFNZ agrees that clarification about the meaning of a stated approach would be helpful and clarification of the short term. FFNZ considers that these ought to be based on the understanding that the implementation of obligations are staged in a way that minimises social and economic costs and disruption and that short term targets are reasonable and achievable.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9350	Objective 4	DELETE from Objective 4 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.	Oppose in part	FFNZ supports the NRP as long as it is not used to grandparent and is used as a reference point only. FFNZ has concerns with the use of Overseer as a regulatory tool and considers it is more appropriate as a decision support tool.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11775	Objective 4	RETAIN Objective 4.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8224	Objective 4	AMEND Objective 4 to read: "A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural well-being in the short term while that requires: a) considering the values and uses when taking action to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens to achieve the attribute targets for the Waikato and Waipā Rivers; b) Recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1".	Oppose	FFNZ considers that Objective 4 ought to recognise and provide for social, economic and cultural wellbeing and adopt an approach that imposes the lowest social and economic cost and disruption. FFNZ does not agree that all contaminants must be reduced and prefers an approach that reasonably manages discharges whilst recognising and providing for social, economic and cultural wellbeing.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10269	Objective 4	RETAIN Objective 4.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3298	Objective 4	RETAIN Objective 4.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Waikato Dairy Leaders Group Submitter ID: 74049	PC1-10926	Objective 4	RETAIN the intent of Objective 4 as set out in 'Reasons for adopting Objective 4'.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Waikato Environment Centre Submitter ID: 73436	PC1-6234	Objective 4	AMEND Objective 4 to recognise the potential off-sets to the costs of change, and the potential economic benefits, that will assist in limiting any social disruption.	Oppose	While FFNZ supports offsetting in principle, FFNZ considers that the economic costs need to be taken into account and does not agree that offsetting will turn these into benefits or reverse a conclusion that PC1 will impose significant economic and social cost.
Waikato Regional Council Submitter ID: 72890	PC1-2992	Objective 4	RETAIN Objective 4.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11266	Objective 4	AMEND Objective 4 to read: "A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural well-being in the short term while:..."	Support in part	FFNZ agrees that their social, economic and cultural well-being ought to be provided for and not just limited to the short term. FFNZ also considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2081	Objective 4	RETAIN Objective 4.	Oppose in part	FFNZ considers that further amendments are needed to Objective 4 as set out in its submission on Variation 1. This include clarification about filling information gaps and providing flexibility for mitigations in FEPs.
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-11148	Objective 5	No specific decision requested for Objective 5.	Oppose in part	FFNZ considers that paragraph b ought to be deleted.
Balle Bros Group Submitter ID: 67834	PC1-11394	Objective 5	No specific decision was requested for Objective 5.	Oppose in part	FFNZ considers that paragraph b ought to be deleted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Buckley, Peter Ross Submitter ID: 71423	PC1-1378	Objective 5	AMEND PPC1 to acknowledge primary production as a core value to reflect Mana Tangata.	Support in part	FFNZ agrees that primary production ought to be recognised as a core value but considers it is a core value for the entire catchment, not just for tangata whenua.
Cameron, Bruce Submitter ID: 60603	PC1-6224	Objective 5	AMEND PPC1 to acknowledge primary production as a core value to reflect in Mana Tangata.	Support in part	FFNZ agrees that primary production ought to be recognised as a core value but considers it is a core value for the entire catchment, not just for tangata whenua.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10775	Objective 5	RETAIN Objective 5 as currently worded.	Oppose in part	FFNZ considers that paragraph b ought to be deleted.
Department of Conservation Submitter ID: 71759	PC1-10545	Objective 5	AMEND Objective 5 to clearly outline that intrinsic values be recognised and provided for as required by section 5 and section 6 of the Resource Management Act. AND AMEND clause b to clarify that the intrinsic values are not considered 'impediments'.	Oppose	FFNZ does not agree that Objective 5 is required by the RMA to outline how intrinsic values will be recognised and provided for. FFNZ agrees that intrinsic values are not impediments if the submitter is referring to the values in section 3.11.1 and a reasonable balancing of these values.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9706	Objective 5	RETAIN Objective 5 as notified.	Oppose in part	FFNZ considers that paragraph b ought to be deleted.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10009	Objective 5	RETAIN Objective 5.	Oppose in part	FFNZ considers that paragraph b ought to be deleted.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9158	Objective 5	RETAIN Objective 5.	Oppose in part	FFNZ considers that paragraph b ought to be deleted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Miraka Limited Submitter ID: 73492	PC1-8809	Objective 5	AMEND to clarify the minimisation of new impediments (refer submission point 8829 re Policy 16 for further discussion).	Oppose in part	FFNZ considers that management of activities ought to be on the basis of effects and not ownership. FFNZ is concerned about the environmental, economic, social and cultural implications if new impediments are “minimised” for tangata whenua land. FFNZ considers that paragraph b ought to be deleted.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6391	Objective 5	DELETE Objective 5 Clause b).	Support	FFNZ agrees that paragraph b ought to be deleted. This would reflect an effects based approach to managing activities as opposed to ownership based.
Pinnell, Graham Submitter ID: 74007	PC1-4942	Objective 5	DELETE Objective 5b and Policy 16.	Support	FFNZ agrees that paragraph b ought to be deleted. This would reflect an effects based approach to managing activities as opposed to ownership based.
Primary Land Users Group Submitter ID: 71427	PC1-11137	Objective 5	No specific decision was requested for Objective 5.	Oppose in part	FFNZ considers that paragraph b ought to be deleted.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10602	Objective 5	RETAIN Objective 5.	Oppose in part	FFNZ considers that paragraph b ought to be deleted.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11097	Objective 5	No specific decision sought for Objective 5.	Oppose in part	FFNZ considers that paragraph b ought to be deleted.
Stark, Steven and Theresa Submitter ID: 73721	PC1-5075	Objective 5	DELETE Objective 5 in its entirety.	Support in part	FFNZ considers that activities ought to be managed on the basis of effects as opposed to ownership. FFNZ considers that the framework proposed in its submission on Variation 1 provides a reasonable

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					consenting pathway for any land (including tangata whenua land) based on effects.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8226	Objective 5	AMEND Objective 5(a)ii to read: " <u>While achieving the water quality attributes and targets in Table 3.11-1</u> actively sustain a relationship with ancestral land and with the rivers and others water bodies in the catchments."	Oppose in part	While FFNZ agrees that all activities ought to be subject the targets, FFNZ does not support the 80 year targets for reasons including that they are based on flawed assumptions and will impose significant economic, social and cultural cost for no net benefit.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11267	Objective 5	RETAIN Objective 5 as notified or amended by similar wording to like effect.	Oppose in part	FFNZ considers that paragraph b ought to be deleted.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2082	Objective 5	RETAIN Objective 5.	Oppose in part	FFNZ considers that paragraph b ought to be deleted.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	V1PC1-223	Support with amendments	RETAIN Objective 6. AND ADD the following sentence before subsection (a): ' <u>The Whangamarino Wetland is restored over the long-term, and protected and enhanced in the short term.</u> ' AND AMEND to ensure that it: achieves the protection of the significant values of wetlands, including their ecosystems, hydrological functioning and extent; achieves recognition of the high significance of the Whangamarino Wetland complex as a whole and its values by identifying it as an outstanding fresh water body;	Oppose	FFNZ is concerned that the proposed amendments are too stringent, will impose significant cost and are not consistent with a tailored and community driven approach as anticipated in Method 3.11.4.4.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			and manages the contaminant loads entering the Whangamarino Wetland by taking account all in flows.		
Balle Bros Group Submitter ID: 67834	V1PC1-169	Support with amendments	AMEND Objective 6 to acknowledge the contribution that pest fish species make to the turbidity and resuspension of nutrients within the system. AND AMEND Objective 6 to require the reduction, where necessary, of each of the four contaminants to ensure that contaminant loads both entering and leaving Whangamarino Wetland are consistent with the achievement of the water quality attribute targets in Table 3.11-1.	Support in part	FFNZ agrees that all sources of contaminants, including pest fish species, ought to be taken into account. FFNZ agrees that the wording ought to be less definitive about requiring reduction e.g. “require reduction where necessary” or “manage.” FFNZ does not support the 80 year targets in Table 3.11-1.
Department of Conservation Submitter ID: 71759	V1PC1-401	Support	RETAIN Objective 6.	Oppose in part	FFNZ considers that amendment to Objective 6 are required to clarify that catchment loads are managed to assist with achieving the outcomes in the Vision & Strategy and values, as opposed to stating that they will achieve this. FFNZ considers that a holistic approach is required and reducing contaminant loads is just one of the measures likely to be needed to improve water quality. For example, managing pest fish will also assist.
Ravensdown Limited Submitter ID: 74058	V1PC1-269	Support	RETAIN Objective 6 as notified.	Oppose in part	FFNZ considers that amendment to Objective 6 are required to clarify that catchment loads are managed to assist with achieving the outcomes in the Vision & Strategy and values, as opposed to stating that they will achieve this. FFNZ considers that a holistic approach is required and reducing contaminant loads is just one of the measures likely to be needed to improve water quality. For example, managing pest fish will also assist.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Tuwharetoa Maori Trust Board Submitter ID: 73356	V1PC1-929	Support	RETAIN the re-insertion of Objective 6.	Oppose in part	FFNZ considers that amendment to Objective 6 are required to clarify that catchment loads are managed to assist with achieving the outcomes in the Vision & Strategy and values, as opposed to stating that they will achieve this. FFNZ considers that a holistic approach is required and reducing contaminant loads is just one of the measures likely to be needed to improve water quality. For example, managing pest fish will also assist.
Waikato and Waipa River Iwi Submitter ID: 74035	V1PC1-516	Support	RETAIN the re-insertion of Objective 6.	Oppose in part	FFNZ considers that amendment to Objective 6 are required to clarify that catchment loads are managed to assist with achieving the outcomes in the Vision & Strategy and values, as opposed to stating that they will achieve this. FFNZ considers that a holistic approach is required and reducing contaminant loads is just one of the measures likely to be needed to improve water quality. For example, managing pest fish will also assist.
Waikato Regional Council Submitter ID: 72890	V1PC1-179	Support	RETAIN Objective 6 provisions relating to Whangamarino Wetland.	Oppose in part	FFNZ considers that amendment to Objective 6 are required to clarify that catchment loads are managed to assist with achieving the outcomes in the Vision & Strategy and values, as opposed to stating that they will achieve this. FFNZ considers that a holistic approach is required and reducing contaminant loads is just one of the measures likely to be needed to improve water quality. For example, managing pest fish will also assist.
Wairakei Pastoral Ltd Submitter ID: 74095	V1PC1-460	Support	RETAIN Objective 6 OR AMEND to like effect.	Oppose in part	FFNZ considers that amendment to Objective 6 are required to clarify that catchment loads are managed to assist with achieving the outcomes in the Vision & Strategy and values, as opposed to stating that they will achieve this. FFNZ considers that a holistic approach is required and reducing contaminant loads is just one of the measures likely

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					to be needed to improve water quality. For example, managing pest fish will also assist.
Wairakei Pastoral Ltd Submitter ID: 74095	V1PC1-653	Support	RETAIN Reasons for adopting Objective 6 OR AMEND to like effect.	Oppose in part	FFNZ considers that amendment to Objective 6 are required to clarify that catchment loads are managed to assist with achieving the outcomes in the Vision & Strategy and values, as opposed to stating that they will achieve this. FFNZ considers that a holistic approach is required and reducing contaminant loads is just one of the measures likely to be needed to improve water quality. For example, managing pest fish will also assist.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6392	Reasons for objectives	DELETE Principal Reasons for Adopting Objectives 1-6. IF that relief is not accepted, AMEND to reframe the explanation with respect to the policies and methods, without confusing, repeating or extending the issues expressed in the policies and methods.	Oppose in part Support in part	FFNZ considers that the principle reasons are helpful and ought to be retained provided they are amended to reflect the changes set out in FFNZ's submission on Variation 1.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11268	Reasons for objectives	No specific decision sought for Principal Reasons for Adopting Objectives 1-6 [However refer changes to reasons for specific objectives].	Oppose in part Support in part	FFNZ considers that the principle reasons are helpful and ought to be retained provided they are amended to reflect the changes set out in FFNZ's submission on Variation 1.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	V1PC1-1116	Reasons for objectives	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-6392: [DELETE Principal Reasons for Adopting Objectives 1-6. IF that relief is not accepted, AMEND to reframe the explanation with respect to the policies and methods, without	Oppose in part Support in part	FFNZ considers that the principle reasons are helpful and ought to be retained provided they are amended to reflect the changes set out in FFNZ's submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			confusing, repeating or extending the issues expressed in the policies and methods.]		
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10622	Reasons for objective 1	AMEND the reasons for adopting the Objective 1 to read: "...Objective 1 sets a long term limits goal for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80-year <u>desired</u> water quality targets <u>states</u> , which result in improvements in water quality from the current state monitored in 2010-2014. The water quality <u>states</u> attributes listed in Table 3.11-1 that will be achieved by 2096 will be used to characterise the <u>desired</u> water quality of the different Freshwater Management Units when the effectiveness of the objective is assessed. <u>Objective 1 gives effect to the Vision and Strategy.</u> "	Support in part	FFNZ supports amendments to change terminology to be consistent with the NPS-FM and to reflect that the short term targets are not limits or targets in an NPS-FM sense. However, FFNZ considers that further changes are necessary to reflect the relief it seeks for Objective 1 as set out in its submission on Variation 1.
Fulton Hogan Limited Submitter ID: 74048	PC1-10863	Reasons for objective 1	AMEND the Reasons for Objective 1 as follows: "Objective 1 sets a long term limits goal for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80-year <u>desired</u> water quality targets <u>states</u> which result in improvements in water quality from the current state monitored in 2010-2014. The water quality <u>states</u> attributes listed in Table 3.11-1 that will be achieved by 2026 will be used to characterise the <u>desired</u> water	Support in part	FFNZ supports amendments to change terminology to be consistent with the NPS-FM and to reflect that the short term targets are not limits or targets in an NPS-FM sense. However, FFNZ considers that further changes are necessary to reflect the relief it seeks for Objective 1 as set out in its submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			quality of the different FMUs when the effectiveness of the objective is addressed. <u>Objective 1 gives effect to the Vision and Strategy."</u>		
GBC Winstone Submitter ID: 73992	PC1-3604	Reasons for objective 1	AMEND Reasons for adopting Objective 1 as follows: "Objective 1 sets a long term limits ^{goal} for water quality ... Objective 1 sets aspirational 80-year desired water quality targets ^{states} ^, which result ... The water quality states ^{attributes} listed in Table ... to characterise the desired water quality of the different ... objective is assessed. <u>Objective 1 gives effect to the Vision and Strategy."</u>	Support in part	FFNZ supports amendments to change terminology to be consistent with the NPS-FM and to reflect that the short term targets are not limits or targets in an NPS-FM sense. However, FFNZ considers that further changes are necessary to reflect the relief it seeks for Objective 1 as set out in its submission on Variation 1.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10012	Reasons for objective 1	AMEND the Reasons for adopting Objective 1 to read: "Objective 1 sets long term limits for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80-year water quality targets, which result in improvements in water quality from the current state monitored in 2010-2014. The water quality attributes listed in Table 3.11-1 (and/or the <u>contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX</u>) that will be achieved by 2096 will be used to characterise the water quality of the different FMU's when the effectiveness of the objective is assessed. <u>There is benefit in</u>	Oppose in part	FFNZ does not support allocating contaminant loads for reasons including that it is premature, there is no reliable or equitable basis to allocate and the 80 year targets are flawed. FFNZ considers that there is a need to provide flexibility and for coordinated whole of sub-catchment actions but it does not support allocating sub-catchment loads to collectives or providing for autonomy in terms of allocation, water quality etc.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>providing flexibility to land managers seeking to achieve reductions collaboratively at a catchment or sub-catchment scale. Contaminant load targets are therefore set for sub-catchments to support achieving the Vision and Strategy."</u>		
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8228	Reasons for objective 1	AMEND the Reasons for adopting Objective 1 to reflect the changes sought for Objective 1.	Oppose	FFNZ does not support the changes the submitter seeks to Objective 1 and seeks changes to the reasons to reflect FFNZ's views on Objective 1 as set out in its submission on Variation 1.
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-832	Reasons for objective 1	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10622, to the extent it is not modified by their V1 submission: [AMEND the reasons for adopting the Objective 1 to read: "...Objective 1 sets a long term limits goal for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80-year <u>desired</u> water quality targets <u>states</u> [^] , which result in improvements in water quality from the current state monitored in 2010-2014. The water quality <u>states</u> attributes [^] listed in Table 3.11-1 that will be achieved by 2096 will be used to characterise the <u>desired</u> water quality of the different Freshwater Management Units when the effectiveness of the objective is	Support in part	FFNZ supports amendments to change terminology to be consistent with the NPS-FM and to reflect that the short term targets are not limits or targets in an NPS-FM sense. However, FFNZ considers that further changes are necessary to reflect the relief it seeks for Objective 1 as set out in its submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			assessed. <u>Objective 1 gives effect to the Vision and Strategy.</u> "]		
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1625	Reasons for objective 1	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10012: [AMEND the Reasons for adopting Objective 1 to read: "Objective 1 sets long term limits for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80-year water quality targets, which result in improvements in water quality from the current state monitored in 2010-2014. The water quality attributes listed in Table 3.11-1 (<u>and/or the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX</u>) that will be achieved by 2096 will be used to characterise the water quality of the different FMU's when the effectiveness of the objective is assessed. <u>There is benefit in providing flexibility to land managers seeking to achieve reductions collaboratively at a catchment or sub-catchment scale. Contaminant load targets are therefore set for sub-catchments to support achieving the Vision and Strategy.</u> "]	Oppose in part	FFNZ does not support allocating contaminant loads for reasons including that it is premature, there is no reliable or equitable basis to allocate and the 80 year targets are flawed. FFNZ considers that there is a need to provide flexibility and for coordinated whole of sub-catchment actions but it does not support allocating sub-catchment loads to collectives or providing for autonomy in terms of allocation, water quality etc.
Primary Land Users Group Submitter ID: 71427	V1PC1-494	Reasons for objective 1	RETAIN reasons for adopting Objective 1.	Oppose	FFNZ considers that changes to the reasons are required to reflect FFNZ's views on Objective 1 as set out in its submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Wairakei Pastoral Ltd Submitter ID: 74095	V1PC1-648	Reasons for objective 1	ADD the following words at the end of Reasons for adopting Objective 1: <u>While all objectives are potentially relevant, individual objectives will only apply where they are relevant in the context of specific resource consent applications. All six objectives will not apply in every case.</u>	Support in part	FFNZ supports an approach that considers only the relevant objectives for each consent application. However, FFNZ considers that changes to the reasons are required to reflect FFNZ's views on Objective 1 as set out in its submission on Variation 1.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10623	Reasons for objective 2	AMEND the reasons for adopting Objective 2 to read: "...The full achievement of the Table 11-1 2096 <u>desired water quality attribute states</u> [^] targets [^] may require a potentially significant departure from how businesses and communities currently function, ..."	Support in part	FFNZ supports amendments to change terminology to be consistent with the NPS-FM and to reflect that the targets are not limits or targets in an NPS-FM sense. However, FFNZ considers that further changes are necessary to reflect the relief it seeks for Objective 2 as set out in its submission on Variation 1.
Fulton Hogan Limited Submitter ID: 74048	PC1-10864	Reasons for objective 2	AMEND the reasons for Objective 2 (second sentence) to read: "The full achievement of Table 11-1 2096 <u>desired water quality attributes</u> [^] states [^] <u>targets</u> [^] may require a..."	Support in part	FFNZ supports amendments to change terminology to be consistent with the NPS-FM and to reflect that the targets are not limits or targets in an NPS-FM sense. However, FFNZ considers that further changes are necessary to reflect the relief it seeks for Objective 2 as set out in its submission on Variation 1.
GBC Winstone Submitter ID: 73992	PC1-3605	Reasons for objective 2	AMEND Reasons for adopting Objective 2 as follows: "Objective 2 sets the ... The full achievement of the Table 11-12096 <u>desired water quality attributes</u> [^] states [^] <u>targets</u> [^] may require ..."	Support in part	FFNZ supports amendments to change terminology to be consistent with the NPS-FM and to reflect that the targets are not limits or targets in an NPS-FM sense. However, FFNZ considers that further changes are necessary to reflect the relief it seeks for Objective 2 as set out in its submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10015	Reasons for objective 2	AMEND the Reasons for adopting Objective 2 to read: "Objective 2 sets the long-term outcome for people and communities, recognising that restoration and protection of water quality will continue to support communities and the economy. The full achievement of the Table 11-1 2096 water quality attribute target may require a potentially significant departure from how businesses and communities currently function, and it is important to minimise <u>economic and social</u> disruption during this transition."	Support in par	FFNZ agrees that economic cost and disruption ought to be taken into account. However, FFNZ considers that further changes are necessary to reflect the relief it seeks for Objective 2 as set out in its submission on Variation 1.
Miraka Limited Submitter ID: 73492	PC1-8907	Reasons for objective 2	AMEND the last sentence of Reasons for Adopting Objective 2 to read as follows: "... and it is important to minimise social disruption <u>and economic hardship</u> during this transition."	Support in par	FFNZ agrees that economic cost and disruption ought to be taken into account. However, FFNZ considers that further changes are necessary to reflect the relief it seeks for Objective 2 as set out in its submission on Variation 1.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8229	Reasons for objective 2	RETAIN Reasons for adopting Objective 2.	Oppose	FFNZ considers that further changes are necessary to reflect the relief it seeks for Objective 2 as set out in its submission on Variation 1.
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-833	Reasons for objective 2	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10623, to the extent it is not modified by their V1 submission: [AMEND the reasons for adopting Objective 2 to read: "...The full	Support in part	FFNZ supports amendments to change terminology to be consistent with the NPS-FM and to reflect that the targets are not limits or targets in an NPS-FM sense.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			achievement of the Table 11-1 2096 <u>desired</u> water quality attribute <u>states</u> [^] targets [^] may require a potentially significant departure from how businesses and communities currently function, ..."]		However, FFNZ considers that further changes are necessary to reflect the relief it seeks for Objective 2 as set out in its submission on Variation 1.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1626	Reasons for objective 2	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10015: [AMEND the Reasons for adopting Objective 2 to read: "Objective 2 sets the long-term outcome for people and communities, recognising that restoration and protection of water quality will continue to support communities and the economy. The full achievement of the Table 11-1 2096 water quality attribute target may require a potentially significant departure from how businesses and communities currently function, and it is important to minimise <u>economic and social</u> disruption during this transition."]	Support in part	FFNZ agrees that economic cost and disruption ought to be taken into account. However, FFNZ considers that further changes are necessary to reflect the relief it seeks for Objective 2 as set out in its submission on Variation 1.
DairyNZ Submitter ID: 74050	PC1-10189	Reasons for objective 3	AMEND Reasons for adopting Objective 3 to read: "Objective 3 sets short term goals <u>targets</u> for a 10-year period, to show the first step toward full achievement of water quality consistent with the Vision and Strategy. <u>As noted in the explanation to Table 3.11-1 on page 56, water quality targets are not intended to be</u>	Support in part Oppose in part	FFNZ considers that care ought to be adopted in referring to NPS-FM defined terms, particularly when this plan change is interim or transitional and there are significant information gaps. Therefore, FFNZ opposes the substitution of the word "target" for "goal." FFNZ agrees with clarification that the targets are not limits or standards. However, it does not support the 80 year targets.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>used directly as receiving water compliance limits/standards."</u>		
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10625	Reasons for objective 3	AMEND the reasons for adopting Objective 3 to read: "...at the time of consent renewal, guided by the targets and limits set in Objective 1 and Objective 3. <u>Objective 3 is a freshwater objective for the purposes of the National Policy Statement for Freshwater Management."</u>	Support in part	In principle, FFNZ supports the amendments but only if Objectives 1 and 3 are amended as set out in its submission and there is clarity that these are intended to be freshwater objectives for the purpose of the NPS-FM.
Fulton Hogan Limited Submitter ID: 74048	PC1-10865	Reasons for objective 3	AMEND the reasons for Objective 3 (paragraph 3) to read: "...time of consent renewal, guided by the targets and limits set in Objective 1 and Objective 3. <u>Objective 3 is a freshwater objective for the purposes of the NPSFM."</u>	Support in part	In principle, FFNZ supports the amendments but only if Objectives 1 and 3 are amended as set out in its submission and there is clarity that these are intended to be freshwater objectives for the purpose of the NPS-FM.
GBC Winstone Submitter ID: 73992	PC1-3606	Reasons for objective 3	AMEND the third paragraph of Reasons for adopting Objective 3 as follows: "Point source discharges ... renewal, guided by the targets and limits set in Objective 1 and Objective 3. <u>Objective 3 is a freshwater objective for the purposes of the NPSFM."</u>	Support in part	In principle, FFNZ supports the amendments but only if Objectives 1 and 3 are amended as set out in its submission and there is clarity that these are intended to be freshwater objectives for the purpose of the NPS-FM.
Hamilton City Council Submitter ID: 74051	PC1-10248	Reasons for objective 3	AMEND paragraph 3 in Reasons for adopting Objective 3 to read as: "Point source discharges are currently managed through existing resource consents, and further action required to improve the quality of these discharges will occur on a case-by case basis at <u>following</u> the time of consent renewal, guided by	Support in part Oppose in part	FFNZ considers that point source discharges ought to be considered at the time of consent renewal (and taking into account the likely impact of the discharge sought by the consent on those discharges). FFNZ agrees that the approach ought to be staged and provide for BPO but the same approach ought

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			the targets and limits set in Objective 1 <u>and recognising the need for a staged approach and application of the best practicable option.</u> "		to apply to diffuse discharge as it does to point source discharges.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10016	Reasons for objective 3	<p>AMEND the Reasons for adopting Objective 3 to read: "Objective 3 sets short term goals for a 10 years period, to show the first step toward full achievement of water quality consistent with the Vision and Strategy.</p> <p>The effort required to make the first step may not fully reflected in water quality improvements that are measurable in the water in 10 years. For this reason, the achievement of the objective will rely on measurement and monitoring of actions taken on the land to reduce pressures on water quality. <u>A range of actions will be promoted including collaborative approaches to managing discharges at a sub-catchment scale to achieve sub-catchment load limits.</u></p> <p>Point source discharged are currently managed through existing resource consents, and further action required to improve the quality of these discharges will occur on a case-by-case basis at the time of consent renewal, <u>guided by giving effect to</u></p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports providing for a range of actions but does not support allocation of loads or delegation of responsibilities (including allocation) to sub-catchment collectives.</p> <p>FFNZ considers that consent renewals ought to comply with targets but does not agree with the 80 year targets for reasons including that they are based on flawed assumptions.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			the targets and limits set in Objective 1."		
Mercury NZ Limited Submitter ID: 73182	PC1-11312	Reasons for objective 3	RETAIN Reasons for adopting Objective 3.	Oppose in part	FFNZ considers that the reasons for Objective 3 ought to be amended as proposed in its submission on Variation 1 to refer to sub-catchment and FMU characteristics.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-12313	Reasons for objective 3	DELETE from the Reasons for Adopting Objective 3: "Point source discharges are currently managed through existing resource consents, and further action required to improve the quality of these discharges will occur on a case by case basis at the time of consent renewal, guided by the targets and limits set in Objective 1."	Oppose	FFNZ considers that all discharges ought to be subject to targets and not just diffuse.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8230	Reasons for objective 3	AMEND Reasons for adopting Objective 3 to reflect the changes sought in Objective 3 , AND AMEND to ensure that Council set dates for limits/targets in a rule to trigger a review of consents on a sub-catchment or Freshwater Management Unit basis.	Oppose	FFNZ does not support the changes sought by the submitter to Objective 3. FFNZ considers that the reasons for Objective 3 ought to be amended as proposed in its submission on Variation 1 to refer to sub-catchment and FMU characteristics. FFNZ does not support a requirement to review consents because it considers that such an approach will likely impose uncertainty and significant cost for no net benefit.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11270	Reasons for objective 3	AMEND the Reasons for Adopting Objective 3 to read: "Point source discharges are currently managed through <u>permitted activity rules and</u> existing resource consents, and further action required to improve the quality of these discharges will occur on a case-by-case basis at the time of consent	Support	FFNZ considers that the objectives ought to apply to all discharges. They should apply to point source discharge whether they are authorised by consent or permitted activity rule.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			renewal <u>(where relevant)</u> , guided by the targets and time limits set in Objective 1."		
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-834	Reasons for objective 3	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10625, to the extent it is not modified by their V1 submission: [AMEND the reasons for adopting Objective 3 to read: "...at the time of consent renewal, guided by the targets and limits set in Objective 1 and Objective 3. <u>Objective 3 is a freshwater objective for the purposes of the National Policy Statement for Freshwater Management.</u> "]	Support in part	In principle, FFNZ supports the amendments but only if Objectives 1 and 3 are amended as set out in its submission and there is clarity that these are intended to be freshwater objectives for the purpose of the NPS-FM.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1627	Reasons for objective 3	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10016: [AMEND the Reasons for adopting Objective 3 to read: "Objective 3 sets short term goals for a 10 years period, to show the first step toward full achievement of water quality consistent with the Vision and Strategy. The effort required to make the first step may not fully reflected in water quality improvements that are measurable in the water in 10 years. For this reason, the achievement of the objective will rely on measurement and monitoring of actions taken on the land to reduce	Support in part Oppose in part	FFNZ supports providing for a range of actions but does not support allocation of loads or delegation of responsibilities (including allocation) to sub-catchment collectives. FFNZ considers that consent renewals ought to comply with targets but does not agree with the 80 year targets for reasons including that they are based on flawed assumptions.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>pressures on water quality. <u>A range of actions will be promoted including collaborative approaches to managing discharges at a sub-catchment scale to achieve sub-catchment load limits.</u></p> <p>Point source discharges are currently managed through existing resource consents, and further action required to improve the quality of these discharges will occur on a case-by-case basis at the time of consent renewal, guided by giving effect to the targets and limits set in Objective 1."]</p>		
Mercury NZ Limited Submitter ID: 73182	V1PC1-1059	Reasons for objective 3	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11312: [RETAIN Reasons for adopting Objective 3].	Oppose in part	FFNZ considers that the reasons for Objective 3 ought to be amended as proposed in its submission on Variation 1 to refer to sub-catchment and FMU characteristics.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	V1PC1-1117	Reasons for objective 3	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12313: [DELETE from the Reasons for Adopting Objective 3: " Point source discharges are currently managed through existing resource consents, and further action required to improve the quality of these discharges will occur on a case by case basis at the time of consent renewal, guided by the targets and limits set in Objective 4. "]	Oppose	FFNZ considers that all discharges ought to be subject to targets and not just diffuse.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Chhagn Bros Co Ltd Submitter ID: 73762	PC1-5514	Reasons for objective 4	AMEND Objective 4 to recognise that PPC1 is transitional, to provide time to develop the tools required to more efficiently allocated responsibility for achieving contaminant reduction targets in the long term.	Support in part	FFNZ agrees that PC1 ought to be staged and transitional with time to develop tools and mitigations and to understand the catchment.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10017	Reasons for objective 4	AMEND the Reasons for adopting Objective 4 to read: "... Objective 4 seeks to minimise economic and social disruption in the short term, while encouraging preparation for possible future requirements." AND ADD the following statement: " <u>The consenting regime will manage to discharges from activities by managing the use. The regime is, therefore, a discharge consent regime under section 15 RMA not a land use consent regime under section 9 RMA.</u> "	Support in part Oppose in part	FFNZ supports the addition of "economic" costs and management of activities on the basis of effects. However, FFNZ does not agree that the regime is solely a section 15 discharge control and considers that a hybrid section 9 and section 15 approach is likely to be more realistic and preferable.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8233	Reasons for objective 4	AMEND Objective 4 to read: " A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural well-being in the short term while that requires: a) considering the values and uses when taking action to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens to achieve the attribute targets for the Waikato and Waipā Rivers; b) Recognising that further	Oppose	FFNZ considers that Objective 4 ought to recognise and provide for social, economic and cultural wellbeing and adopt an approach that imposes the lowest social and economic cost and disruption. FFNZ does not agree that all contaminants must be reduced and prefers an approach that reasonably manages discharges whilst recognising and providing for social, economic and cultural wellbeing.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1".		
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11271	Reasons for objective 4	AMEND the Reasons for Adopting Objective 4 by adding the following paragraph: <u>"Encouraging enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change will provide a key method (alongside participation in any relevant Certified Industry Schemes) for achieving clear and enduring improvements in water quality."</u>	Oppose	FFNZ does not support a regime that allocates contaminants to sub-catchment collectives, or provides consents on a sub-catchment basis or gives collectives the power to allocate resources.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	V1PC1-333	Reasons for objective 4	RETAIN Reasons for adopting Objective 4 as notified.	Oppose	FFNZ considers that the reasons for Objective 4 need to be amended as proposed in its submission on Variation 1 to reflect the fact that it is premature to determine or signal property level allocation.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1628	Reasons for objective 4	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10017: [AMEND the Reasons for adopting Objective 4 to read: "... Objective 4 seeks to minimise <u>economic and</u> social disruption in the short term, while encouraging preparation for possible future requirements."	Support in part Oppose in part	FFNZ supports the addition of "economic" costs and management of activities on the basis of effects. However, FFNZ does not agree that the regime is solely a section 15 discharge control and considers that a hybrid section 9 and section 15 approach is likely to be more realistic and preferable.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND ADD the following statement: "The consenting regime will manage to discharges from activities by managing the use. The regime is, therefore, a discharge consent regime under section 15 RMA not a land use consent regime under section 9 RMA."]		
Tuwharetoa Maori Trust Board Submitter ID: 73356	V1PC1-932	Reasons for objective 4	RETAIN the V1 amendment of '(the short term 10 year period)' to the Reasons for adopting Objective 4.	Support	FFNZ agrees that clarification of the short term period being 10 years is helpful.
Waikato and Waipa River Iwi Submitter ID: 74035	V1PC1-536	Reasons for objective 4	RETAIN the V1 amendments to the Reasons for adopting Objective 4.	Support	FFNZ agrees that clarification of the short term period being 10 years is helpful.
Wairakei Pastoral Ltd Submitter ID: 74095	V1PC1-649	Reasons for objective 4	ADD the following words at the end of Reasons for adopting Objective 4: <u>While adaptive management approaches will be relevant during the short-term, they will also remain equally relevant during the long-term for achieving anticipated environmental outcomes.</u> <u>Accordingly, Objective 4 speaks both to the current plan period and to the future beyond that, and is therefore not limited temporally by reference to a specific time period only.</u> <u>Effectively, the short-term should merge seamlessly with the long-term and adaptive management approaches should (where relevant) be used throughout.</u>	Support in part Oppose in part	In principle, FFNZ supports an adaptive management approach if it is not based on a precautionary approach and if it involves refining targets and becoming more specific as information and science improves. FFNZ does not agree that Objective 4 (or the reasons for it) should pre-empt the future.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8235	Reasons for Objective 5	AMEND Objective 5(a)ii to read: " <u>While achieving the water quality attributes and targets in Table 3.11-1 actively sustain a relationship with ancestral land and with the rivers and others water bodies in the catchments.</u> "	Oppose in part	While FFNZ agrees that all activities ought to be subject the targets, FFNZ does not support the 80 year targets for reasons including that they are based on flawed assumptions and will impose significant economic, social and cultural cost for no net benefit. FFNZ considers tha the reasons for Objective 5 ought to be significantly amended by deleting all but the first sentence as set out in its submission on Variation 1.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	V1PC1-225	Reasons for objective 6	AMEND Reasons for adopting Objective 6 as follows: '...It seeks to recognise that the bog ecosystems (which are particularly sensitive to discharges of contaminants) <u>all wetland ecosystems need protection to protect and restore the bog ecosystems (which are particularly sensitive to discharges of contaminants) over time...</u> '	Oppose	FFNZ considers that this should not be extended to all wetlands for reasons including that this would impose significant cost and uncertainty (e.g. in identifying what is a wetland).
Department of Conservation Submitter ID: 71759	V1PC1-408	Reasons for objective 6	RETAIN Reasons for adopting Objective 6.	Oppose	FFNZ considers that the reasons for Objective 6 need to be amended as set out in FFNZ's submission on Variation 1.
Tuwharetoa Maori Trust Board Submitter ID: 73356	V1PC1-930	Reasons for objective 6	RETAIN the re-insertion of Reasons for adopting Objective 6.	Oppose	FFNZ considers that the reasons for Objective 6 need to be amended as set out in FFNZ's submission on Variation 1.
Waikato and Waipa River Iwi Submitter ID: 74035	V1PC1-520	Reasons for objective 6	RETAIN the re-insertion of Reasons for adopting Objective 6.	Oppose	FFNZ considers that the reasons for Objective 6 need to be amended as set out in FFNZ's submission on Variation 1.



Federated Farmers of New Zealand

Further submission on Proposed Waikato Regional Plan Change 1 and Variation 1 Waikato and Waipa River Catchments

17 September 2018



**FURTHER SUBMISSION TO WAIKATO REGIONAL COUNCIL ON PROPOSED WAIKATO
REGIONAL PLAN CHANGE 1 AND VARIATION 1 WAIKATO AND WAIPA RIVER
CATCHMENTS**

Form 6

Further submission in support of, or in opposition to, submission on notified proposed plan change
and plan variation

Clause 8 of Schedule 1, Resource Management Act 1991

To: The Chief Executive
 Waikato Regional Council
 Private Bag 3038
 Waikato Mail Centre
 Hamilton 3240

Name of submitter: Federated Farmers of New Zealand Inc (“**FFNZ**”)

Contact person: Nikki Edwards
 Senior Policy Advisor

Address for service: nedwards@fedfarm.org.nz
 PO Box 447, Hamilton 3240

This is a further submission in support of or in opposition to a submission on a change and variation to Proposed Waikato Regional Plan Change 1 (“**PC 1**”) and Variation 1 (“**Variation 1**”) Waikato and Waipa River Catchments.

1. FFNZ is a person representing a relevant aspect of public interest, including for the reasons set out under headings 1 and 2 on the following pages.
2. FFNZ is a person who has an interest in the proposal that is greater than the interest the general public has, including for the reasons set out in headings 1 and 2 in the following pages.
3. FFNZ could not gain an advantage in trade competition through this further submission.
4. FFNZ wishes to be heard in support of its submissions and further submission.

Due to the size of FFNZ’s further submissions, this document has been separated into four volumes. In each volume, the first three sections are repeated. Section 4 (the specific comments) are different in each volume as follows:

- a. Volume 1 – Objectives
- b. Volume 2 – Policies

- c. Volume 3 – Methods and Rules
- d. Volume 4 – Schedules, Glossary of Terms and consequential amendments

1. INTRODUCTION

- 1.1 FFNZ welcomes the opportunity to provide further submissions on Plan Change 1 and Variation 1.
- 1.2 As identified in its primary submissions, FFNZ represents a variety of dairy, dry stock, arable crops and horticulture land users in the Waikato region. FFNZ is a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses. FFNZ is a pan sector organisation that works with farmers to ensure practical and workable outcomes.
- 1.3 FFNZ aims to add value to its members' farming businesses. Its key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
 - a. FFNZ's members may operate their business in a fair and flexible commercial environment;
 - b. FFNZ's members, their families and their staff have access to services essential to the needs of the rural community; and
 - c. FFNZ's members adopt responsible management and environmental practices
- 1.4 FFNZ represents members who are engaged in a wide range of land use activities in the Waikato and Waipa River Catchment. This includes dairy farms, a range of drystock activities (including sheep and beef for meat and wool, cattle grazing for dairy support and deer for meat and velvet), horticulture activities (from commercial vegetable growing to cropping to orchards), a mixture of dairy, dry stock and horticulture and intensive farming activities like pig farming.
- 1.5 Both in the lead up to and following FFNZ's submissions on Plan Change 1 and Variation 1, FFNZ has undertaken extensive consultation with its members. This has included public meetings, member advisories, newspaper articles, discussion groups, one on one meetings, meetings with stakeholders, and projects with individual farmers to understand the implications of Plan Change 1 and Variation 1.
- 1.6 FFNZ has also undertaken extensive consultation with a range of farming and community interest groups, as well as territorial authorities and businesses that rely on the rural economy. As the largest pan sector organisation representing farming interests, FFNZ has attempted to find a middle ground position that attempts to balance the competing interests.

2. IMPORTANCE OF FARMING AND HORTICULTURE

- 2.1 Farming, horticulture and primary production activities are important for the social, economic and cultural wellbeing of people and communities in the Waikato region.
- 2.2 The economic importance of the agriculture sector to New Zealand's economy is well recognised. Its direct and indirect contribution to New Zealand's economy is about 15%.
- 2.3 As a broad indicator, Infometrics 2012 identified the agriculture, forestry and fishing industry as contributing the greatest proportion of the Waikato region's GDP (15.9%) and employing 22,090 followed closely by manufacturing (15.6%) which is estimated to have employed 20,513 in 2012. Notably, the Waikato region accounts for about a third of New Zealand's dairy production. Any regional plan provision which affects farm and horticulture business has the potential to also impact, positively or negatively, on regional and national economies.
- 2.4 Agriculture does not just bring economic benefits to the district, it also contributes to the wellbeing of communities and culture of the district. Farming is the fabric that keeps rural communities together.
- 2.5 Farming is such a large part of New Zealand's culture that a lot of depictions of the 'typical' New Zealander involve farming. For example, we are proud of their 'number 8 wire' mentality – referring to a type of fencing wire used on farms that we will use to solve any problem.

3. GENERAL COMMENTS

- 3.1 The further submission process has been an opportunity for parties to understand each other's position and to provide clarity as to their own position. FFNZ has taken the opportunity to understand the submissions of all parties and has attempted to clarify its position. FFNZ has focused primarily on submissions on Plan Change 1 because it provided a comprehensive and detailed submission on Variation 1 and the majority of submissions on Variation 1 were to either largely confirm relief sought on Plan Change 1 or to propose amendments that were similar to many of the amendments FFNZ proposed in its submission on Variation 1.
- 3.2 FFNZ observes that there is overwhelming opposition to Plan Change 1 with the majority of submitters expressing concerns about the implications for economic, social and cultural wellbeing. There are a range of options proposed for how Plan Change 1 ought to be amended to address these but the key theme appears to be flexibility and the ability to increase nitrogen (and potentially other contaminants), in appropriate circumstances.
- 3.3 The key alternatives proposed by other parties appear to be:
 - a. Adopting an approach based on land use capability ("LUC"), natural capital, land use suitability ("LUS") and/or some other measure of productivity or soil capability.
 - b. Adopting Best Practicable Option ("BPO") for diffuse discharges. Some submitters have proposed that this is on the basis of input controls.

- c. Providing greater flexibility for low nitrogen discharges to increase e.g. allow them to increase up to 20kgN.
 - d. Establishing catchment collectives and allocating nitrogen and other contaminants to them to manage among their members.
 - e. Deleting the Nitrogen Reference Point (“NRP”) and 75th percentile and/or determining the 75th percentile based on sub-catchments or some scale other than the Freshwater Management Units (“FMU”).
 - f. Amending the stock exclusion rules (e.g. to base them on slope, stock units or break feeding) or removing them and considering through tailored actions in Farm Environment Plans (“FEPs”).
- 3.4 FFNZ’s position in respect of these, and all proposals made in the submissions (as articulated in the summary of submissions), is set out in the tables contained in section 4 of this further submission. In summary, FFNZ opposes most of these proposals and considers that the framework proposed in its submission on Variation 1 (through track changes to PC1), and as described on pages 14 to 18 of its submission on Variation 1, is a more appropriate framework that will more reasonably achieve sustainable management.
- 3.5 While there are some similarities between parts of many other submitter’s proposals and FFNZ’s proposal, FFNZ considers that its proposed framework deals with the concerns in a more robust and comprehensive way that seeks to provide for all sectors. Importantly, FFNZ considers that its proposal addresses economic, social and cultural wellbeing in a way that is consistent.
- 3.6 As explained in FFNZ’s submission on Variation 1 (pages 10 to 13), FFNZ has attempted to create a policy and rule framework that is effects based, equitable and consistent (noting that this does not require the “same” outcome but it does require a similar approach). This has included consistency in approach between lakes and rivers; urban and rural, point source and diffuse discharges; effects based not ownership approach; consistency in approach across all farming activities and all contaminants.
- 3.7 There are a limited number of submitters who have proposed amendments to make the timeframes in Plan Change 1 shorter or to make targets more stringent or to make greater progress towards the 80 year targets in a shorter timeframe. FFNZ’s key concern is that these submitters do not appear to have considered the economic, social and cultural costs nor have they considered what is technically feasible on the basis of available technology. FFNZ strongly opposes proposals to make Plan Change 1 more stringent.
- 3.8 In most parts of this further submission, FFNZ’s views are contingent on other changes being made as proposed in FFNZ’s submission on Variation 1. In this sense, FFNZ’s submission on Variation 1 needs to be seen as a package and FFNZ’s view on particular provision cannot (and should not) be viewed in isolation.
- 3.9 By way of example, FFNZ’s views on the NRP are contingent on the “package.” As explained in the detailed comments, FFNZ supports the NRP as long as it is not used as an allocation tool or to benchmark nitrogen. FFNZ supports the NRP being used as a reference

point to provide information regarding current discharges. However, FFNZ's view on the NRP needs to be viewed in the context of the various other changes it proposes to the objectives, policies, methods, rules and schedules.

- 3.10 By way of example (this is not an exhaustive list), FFNZ proposes changes to the permitted activity rules such that low nitrogen discharge activities could increase to 15kgN (or some other appropriate permitted baseline) as a permitted activity. FFNZ proposes changes to the policies (such as policy 6) to support applications to increase nitrogen in appropriate circumstances (e.g. Most Practicable Action ("MPA") framework). FFNZ proposes changes to Schedule B to provide for recognition of mitigations outside of Overseer, the use of models other than Overseer and alternatives to standards or missing data.
- 3.11 Finally, there were a very large number of submissions on Plan Change 1 and Variation 1, and the summary of submissions was equally large. This further submission has ended up comprising four very large documents and has taken considerable time to draft. In these circumstances, it is inevitable that there are likely to be some errors or omissions. FFNZ apologises if any comment in this document causes any offence to any party (none is intended). FFNZ welcomes and looks forward to further discussion with Council and the parties prior to the hearing.

4. SPECIFIC COMMENTS

- 4.1 The table on the following pages sets out the particulars of the original submitter and submission number, the provision to which their submission point relates, the relief they seek, whether FFNZ supports or opposes the submission (in whole or in part), and the reasons for FFNZ's position.
- 4.2 In terms of decisions sought, FFNZ seeks that the submission points are allowed to the extent that they are supported in this further submission and that they are disallowed to the extent that they are opposed in this further submission.
- 4.3 FFNZ also seeks any consequential changes necessary to give effect to the relief sought or to address the concerns raised in this further submission

5. FURTHER SUBMISSION SPECIFICS – VOLUME 2 of 4

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Section 3.11.3: Policies					
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-9536	Policy 1	AMEND Policy 1 a) to read: " <u>Enabling activities with a low level of contaminant discharge to water bodies, and</u> " AND AMEND Policy 1 b) to read: " <u>Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges in order, from highest to least.</u> "	Oppose	<p>The submission amendments do not address FFNZ concerns with the policy.</p> <p>FFNZ has concerns that if the approach was adopted such that the highest contaminant discharges had to reduce that would not take into account their particular circumstances e.g. a good farm system on leaky soils or high rainfall could be twice the nitrogen number of a poor farm system on better soils and low rainfall. It is not necessarily the high nitrogen farm that should or is able to reduce. FFNZ does not support a one size fits all approach. FFNZ considers that a tailored approach ought to be adopted.</p> <p>As set out in FFNZ submissions to Variation 1, FFNZ considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.</p>
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10875	Policy 1	AMEND Policy 1 to read: "...a. <u>Enabling, through permitted activity rules,</u> activities with a low level of contaminant discharge to water bodies provided those discharges do not increase and adverse effects, including cumulative effects, are avoided; and b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges <u>so as to avoid adverse</u>	Oppose in part	<p>The submission amendments do not address FFNZ concerns with the policy.</p> <p>As set out in FFNZ submissions to Variation 1, FFNZ considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1. FFNZ does not consider that mitigations in a FEP should be conditions of a resource consent.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>effects, including cumulative effects, through the use of resource consents; and</u></p> <p>...</p> <p><u>d. Allocating diffuse discharges to land based on science defined limits and targets, and progressively phasing out the over-allocation of contaminant discharges over time; and...</u>"</p>		<p>In regards to the submitter's proposed new paragraph d., FFNZ supports a policy to progressively phase out over-allocation of a contaminant discharges over time and also supports the use of science to define targets but it has two issues with the rest of the paragraph:</p> <ol style="list-style-type: none"> 1. It only refers to diffuse discharges and do not also include point source discharge. 2. FFNZ is also concerned that allocation to land refers to property. If so, FFNZ does not support allocation of contaminants to a property level and instead supports a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-12569	Policy 1	<p>AMEND Policy 1 to read: <u>"...e. Progressively increasing riparian buffering of rivers, streams, drains, wetlands and lakes."</u></p>	Oppose in part	<p>FFNZ considers that the provisions around riparian buffering in the proposed plan change is already too stringent and accordingly oppose the submission to make such provision evenmore stringent. Further a policy that instructs the progressively increase of a mitigation method ad infinitum goes beyond maintaining of water quality as required by the NPS-FM and beyond restore and protect in the Vision & Strategy. FFNZ considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge.</p>
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6704	Policy 1	<p>ADOPT Policy 1 as notified. AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	Support in part	<p>As set out in FFNZ submissions to Variation 1, FFNZ seeks to retain policy 1 with amendments to take into account that it considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
Balle, Patricia Katherine Submitter ID: 72557	PC1-4452	Policy 1	AMEND Policy 1 to read as follows: "c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes for areas with <u>a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</u> d. <u>Requiring farming activities on slopes exceeding 15 degrees (where break feeding does not occur) to manage contaminant discharges to water bodies through mitigation actions that specifically target critical source areas.</u> " AND CLARIFY how slope will be measured.	Oppose	The submission amendments do not address FFNZ concerns with the policy. As set out in FFNZ submissions to Variation 1, FFNZ considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1. FFNZ considers that stock exclusion should be based on stocking rate (see FFNZ's submission on Variation 1 on Schedule C)
Balle, Patricia Katherine Submitter ID: 72557	PC1-12570	Policy 1	RETAIN management of diffuse discharges on a sub-catchment basis in Policy 1.	Support	FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis.
Balle, Patricia Katherine Submitter ID: 72557	PC1-12571	Policy 1	AMEND Policy 1 to enable tailored Farm Environment Plans to adopt mitigation appropriate to the water quality gains to be made.	Support	FFNZ supports a tailored and flexible Farm Environment Plan so that reductions on individual properties are proportionate to the how close the sub-catchment is from the particular target and proportionate to the individual property's (or the sector's) contribution towards that contaminant and mitigations are based on MPA.
Balle, Patricia Katherine Submitter ID: 72557	PC1-12572	Policy 1	AMEND the rules to reflect Policy 1 AND AMEND to ensure that subsidies are provided to implement PPC1.	Support in part	FFNZ would support an approach that considers the use of incentives and other public funds to provide compensation where there is a public good.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Balle Bros Group Submitter ID: 67834	PC1-11399	Policy 1	AMEND Policy 1 to read: 'Manage and require " <u>maintenance or</u> " reductions " <u>where relevant</u> " in sub-catchment-wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by: ..."	Support	FFNZ supports the additional phrases as there will be times where maintenance" is the relevant and appropriate metric.
Balle Bros Group Submitter ID: 67834	PC1-12573	Policy 1	AMEND Policy 1 to read: "...c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes <u>for areas with a slope of less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</u> <u>d. Requiring farming activities on slopes exceeding 15 degrees (where break feeding does not occur) to manage contaminant discharges to water bodies through mitigation actions that specifically target critical source areas.</u> "	Oppose	FFNZ considers that stock exclusion should be based on stocking rate rather than degree of slope (see FFNZ's submission on Variation 1 on Schedule C)
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11485	Policy 1	AMEND Policy 1 to enable land uses which are less than or equal to 20 hectares, or which are leaching at or less than the 'sustainable level' (<i>Footnote: 'Sustainable level' can be defined as either a kg liveweight per ha relative to land use capability (LUC) or Nitrogen kg discharge rate per hectare (kgN/ha/year) which achieves the desired in-stream Nitrogen load</i>) to continue and provide them with flexibility to change farm systems or stocking rates up to the 'sustainable level'. AND IF Nitrogen is to be allocated through PPC1 THEN AMEND PPC1	Oppose in part Support in part	In the summary of submissions, many issues are raised for this submitter in a single submission point. FFNZ identifies and sets out responses to many of the issues raised in the submission point. If an issue raised by this submission point is not directly addressed by FFNZ then it is opposed. Generally FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. This recognises the level of risk associated with these activities and likely small environmental gain when compared to the economic and social costs of complying with and enforcing more stringent rules. However FFNZ opposes the adoption of

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>through either amending existing Policies (such as Policy 1) and Rules (such as 3.11.5.1 to 3.11.5.7) OR including a new Policy and associated Rules which sets out how Nitrogen will be allocated and discharges managed.</p> <p>AND AMEND to ensure the allocation and management framework for Nitrogen promotes the efficient use of natural resources AND incentivises activities and behaviour change which promote the sustainable management of natural resources AND will achieve the Vision and Strategy AND incorporates the allocation principles set out under appendix 1 in the submission.</p> <p>AND AMEND PPC1 to manage or allocate Nitrogen based on:</p> <p>(a) 'flat rate per hectare' permitted threshold (where the sub-catchment load is divided by the total number of hectares in the sub-catchment and this amount is allocated as a Nitrogen discharge threshold to each hectare of land) for example 20kgN/ha/year; OR</p> <p>(b) Natural capital or land use suitability based allocation per hectare' where a sub-catchment Nitrogen load is attributed to land based on its underlying characteristics and factors (including productive capability using the Land Use Capability classification system). This approach should be used to determine the permitted baseline, and where required to stage reductions in Nitrogen discharges over time as per Table 1</p>		<p>'sustainable level' as it uses LUC as method to allocate Nitrogen.</p> <p>FFNZ opposes allocation of contaminants to a property level and instead seeks a sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner as set out in FFNZ's submission on Variation 1. FFNZ supports provisions that are equitable, consistent and effects based rather than activity (behaviour) based. Given the generality of the submitter's remark that the allocation principles set out under appendix 1 should be incorporated FFNZ can only respond that to the extent that it aligns with FFNZ's submissions on Plan Change 1 and Variation 1, it supports it. However, to the extent that it is inconsistent with that submission and/or results in more stringent targets or objectives being imposed on farmers, FFNZ does not support it.</p> <p>FFNZ opposes the submitter's basis for management and allocation of Nitrogen. FFNZ seeks an approach that is consistent across all contaminants and not just focussing on N. FFNZ proposes that activities have to address contaminants that are an issue for the sub-catchment in proportion to their contribution towards the issue.</p> <p>FFNZ considers that a "permitted baseline" ought to be provided, either 15kgN (with farming activities able to increase up to it) or some other reasonable measure). FFNZ would support that</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons																																
			<p>below (<i>footnote: Categories and discharge numbers are indicative only and subject to change through Schedule 1 process as more evidence and data becomes available</i>); AND</p> <p>c) Natural capital or land use suitability based threshold for the discharge of Nitrogen per hectare' that is used to determine where and when Council require additional regulatory standards or stricter activity status to reduce Nitrogen loss over time - based on calculating a sub-catchment Nitrogen load and focusing on priority areas where Nitrogen is over allocated and therefore reductions from land uses are required. For example as set out in Table 1.</p> <p>Table 1</p> <table border="1" data-bbox="846 903 1337 1134"> <thead> <tr> <th colspan="8">Land Use Capability - Natural Capital</th> </tr> <tr> <th>Class</th> <th>I</th> <th>II</th> <th>III</th> <th>IV</th> <th>V</th> <th>VI</th> <th>VII</th> </tr> </thead> <tbody> <tr> <td>Year 1 (Kg/N/ha/year)</td> <td>30</td> <td>27</td> <td>24</td> <td>18</td> <td>16</td> <td>15</td> <td>8</td> </tr> <tr> <td>Year 5 (kgN/ha/year)</td> <td>27</td> <td>25</td> <td>21</td> <td>16</td> <td>13</td> <td>12</td> <td>8</td> </tr> </tbody> </table> <p>AND AMEND Policy 1 and Table 3.11-1 OR ADD a NEW Policy which sets out the:</p> <p>a) Current Nitrogen load (<i>footnote: Current Nitrogen load includes both the Allowable in-stream nitrate load to achieve current in-stream Nitrogen</i></p>	Land Use Capability - Natural Capital								Class	I	II	III	IV	V	VI	VII	Year 1 (Kg/N/ha/year)	30	27	24	18	16	15	8	Year 5 (kgN/ha/year)	27	25	21	16	13	12	8		<p>baseline being 20kgN if it was supported by the science.</p> <p>FFNZ opposes the submitter's alternative ((b), (c) and Table 1) which is the use of LUC/natural capital as mechanism or method to allocate Nitrogen. Amongst other reasons, LUC was not designed for Nitrogen leaching and as a result the relationship between LUC and nitrogen is unreliable. The amount of Nitrogen leached from land is due to a wide range of factors which does not form part of LUC.</p> <p>FFNZ also opposes the submitter's proposed amendments to Policy 1 and Table 3.11-1 or the alternative additional new policy a) to d). As earlier stated FFNZ opposes only focussing on N, allocation of contaminants to a property level and the use of LUC as allocation method for Nitrogen.</p> <p>As to the amendments to PPC1 as sought by the submitter in the submission point:</p> <p>FFNZ opposes submitter's f), g) and h). FFNZ is unsure of the particulars of f). For instance does the submitter mean that the last activity, whatever its contribution, that causes the cumulative catchment load to be exceeded must be prohibited, or something else. Generally FFNZ supports effects based provisions rather than blanket provision that prohibit activities as per the submitter's proposed f). FFNZ opposes the submitter's f), g) and h) because FFNZ considers that issues arising from the over allocation of nutrients can generally be addressed in ways other than allocation (see FFNZ's submission on Variation1). Also FFNZ considers that the</p>
Land Use Capability - Natural Capital																																					
Class	I	II	III	IV	V	VI	VII																														
Year 1 (Kg/N/ha/year)	30	27	24	18	16	15	8																														
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Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>concentration and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land)</p> <p>b) Desired Nitrogen load (footnote: Desired Nitrogen load includes both the Allowable in stream nitrate load to achieve the desired in-stream Nitrogen concentration, and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land)</p> <p>c) Nitrogen discharge rate/ha/year to achieve current Nitrogen load</p> <p>d) Nitrogen discharge rate/ha/year to achieve the desired Nitrogen load</p> <p>AND AMEND PPC1 so that:</p> <p>f) activities which would cause the maximum catchment load to be exceeded are avoided</p> <p>g) In catchments which are already over allocated, PPC1 should avoid allocating any further Nitrogen</p> <p>h) In catchments which are already over allocated, PPC1 should put in place Methods (such as a 'sinking lid on the allocation') so that over time the over allocation is phased out.</p> <p>AND AMEND PPC1 to ensure that those activities and land uses which are contributing the most to the over allocated parameter bear the majority of the cost of reducing the over allocation</p> <p>AND AMEND Policy 1 (a) to ensure that low discharging land uses such as small scale (<20kg N/ha) or low impact</p>		<p>submitter's proposed relief at g) of prohibiting allocation of N contradicts its relief that seeks to ensure that low discharge land uses are able to increase their allocated discharges of N.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			activities (those discharging at or below the sustainable level) are enabled to continue and are provided with flexibility to change farm systems and stocking rates up to the sustainable levels for the sub-catchment (Freshwater Management Unit).		
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-12575	Policy 1	<p>AMEND Policy 1 so that management approaches are tailored to addressing water quality issues identified on a sub-catchment basis, and where the responsibility of addressing the impacts is apportioned to those land uses including point and non-point source discharges which have caused or contributed to any over allocation, and where improvements required over time are appropriate to the level of impact.</p> <p>AND AMEND Policy 1 AND/OR include a new Policy to enable establishment and operation of sub-catchment groups working through global consents to sustainably manage land and water resources, to be innovative, to share and move resources as required within environmental limits, to be flexible, to recognise and provide for biodiversity values, to adopt edge of field mitigation and to offset residual impacts.</p> <p>AND AMEND PPC1 and Policy 1 so that land use rules and management frameworks include both land use and ancillary discharge provisions (sections 9 and 15 Resource Management Act)</p> <p>AND AMEND PPC1 and Policy 1 to enable establishment of nutrient user</p>	Support in part Oppose in part	<p>In the summary of submission, many issues are raised for this submitter in a single submission point. FFNZ identifies and sets out responses to many of the issues raised in the submission point. If an issue raised by this submission point is not directly addressed by FFNZ then it is opposed.</p> <p>FFNZ agrees that contaminants and issues are more appropriately targeted and addressed at a sub-catchment level rather than on a property basis. FFNZ does not support allocation of contaminants to a property level.</p> <p>As stated before FFNZ opposes allocation/apportionment of contaminants to a property level but supports that diffuse and point source discharges should be treated equally and proportionally.</p> <p>FFNZ supports sub-catchment groups with group action plans to improve water quality in the subcatchment. FFNZ supports a tailored and proportionate sub-catchment approach. However, it has concerns about an approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ's concerns include that this may devolve power to a particular group, may not result in</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>groups within the same catchment as part of catchment collective groups AND enable transfer of nutrients (at a level not exceeding the desired in-stream nutrient load), where principles in Appendix A of the submission are met, precluding nutrient transfer when allocation is based on current or historic discharges AND transfer within nutrient user groups only occurs: within a sub-catchment or watershed; within an established sub-catchment programme that's based on fair allocation of a load; only pertains to the load which achieves the desired environmental outcome; results in improved economic outcomes and land use optimization.</p> <p>AND AMEND Policy 1 to apply Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and require the application of best practicable option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.</p> <p>AND ADD new Policy 1A OR AMEND Policy 1 to give effect to Objective 1A and 1B with the intent of: <u>"Where current water quality meets the relevant Table 3.11 - 1 water quality outcomes (interim targets or 80 year targets/limits) within each sub-catchment, water quality must be managed in a manner which ensures that the water</u></p>		<p>water quality improvements and may impose significant cost.</p> <p>FFNZ does not support the inclusion of biodiversity and considers the Plan should focus on water quality and contaminants.</p> <p>FFNZ supports coordinated edge of field, multiple property and/or whole of sub-catchment actions.</p> <p>FFNZ support nutrient user groups in a subcatchment in general but FFNZ does not support allocation and accordingly would oppose transfer of nutrient (whether within a nutrient users group or subcatchment collective) because it requires allocation of nutrients. FFNZ has similar concerns as it has with sub-catchment groups with nutrient user groups .</p> <p>FFNZ generally will support provisions that seek that diffuse and point source discharges are treated equally and proportionally. However due to the lack of particulars of how to apply policy 12 and 13 to policy 1, FFNZ states that to the extent that applying policy 12 and 13 to policy 1 aligns with FFNZ's submission on PC1 and Variation 1 FFNZ supports it else it opposes it.</p> <p>FFNZ supports the use of BPOs for point source discharges and MPAs for diffuse discharges.</p> <p>FFNZ agrees that sub-catchment water quality should be managed to improve the water quality to achieve the 10 year targets.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>quality targets/ limits continue to be met beyond the zone of reasonable mixing. Where Table 3.11-1 water quality targets/limits are not met, water quality within the sub-catchment must be managed in a manner which progressively improves existing water quality relevant to the parameter exceeded , in order to meet:</u> <u>(i) The water quality target/limit for the sub-catchment by 2096, and/or</u> <u>(ii) The relevant value that the water quality target/limit is designed to safeguard”</u>		FFNZ does not support the 80 year targets for reasons including that they are based on flawed assumptions and will result in significant cost with no net benefit.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-12576	Policy 1	AMEND Policy 1 (a) as follows: “enabling activities with a low level of contaminant discharge to water bodies provided these discharges do not increase- ” AND AMEND Policy 1 (b) as follows: “Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges; and which exceed the <u>'sustainable level' for the sub-catchment (Freshwater Management Unit) to progressively reduce contaminant discharges over time, where the reductions are proportionate to the level of over allocation within the sub-catchment and proportionate to the discharge level of the activity.”</u>	Oppose in part	As set out in FFNZ submissions to Variation 1, FFNZ considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1. The amendments to policy 1 sought by the submitter does not align with the above. Generally FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. This recognises the level of risk associated with these activities and likely small environmental gain when compared to the economic and social costs of complying with and enforcing more stringent rules. FFNZ opposes the adoption of ‘sustainable level’ as it uses LUC as method to allocate Nitrogen.
Beef + Lamb New Zealand Limited	PC1-12577	Policy 1	AMEND Policy 1 (c) as follows: “progressively excluding cattle, horses, deer, and pigs from rivers, stream,	Oppose	As set out in FFNZ submissions to Variation 1, FFNZ considers that the appropriate course of action for managing discharges is by adopting

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73369			drains, wetlands and lakes <u>on land up to 15 degrees slope, and where break fed on land above 15 degrees slope.</u> AND AMEND PPC1 so intensively farmed animals are required to be excluded from all permanently flowing waterbodies, but enable flexibility for low intensity land uses or/and hill country farming AND focus management approaches for hill country on critical source management.		MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1. The amendments to policy 1 sought by the submitter does not align with above. Further FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that: <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue.
Buckley, Peter Ross Submitter ID: 71423	PC1-1379	Policy 1	AMEND the rules to reflect Policy 1 and 9.	Support in part	The amendments to the rules sought by the submitter is unclear. Accordingly, to the extent that the amendments aligns with FFNZ's submissions on Plan Change 1 and Variation 1, it supports it. However, to the extent that it is inconsistent with that submission and/or results in more stringent targets or objectives being imposed on farmers, FFNZ does not support it.
Buckley, Peter Ross Submitter ID: 71423	PC1-12583	Policy 1	AMEND Policy 1 to read: "c. Progressively excluding cattle, horses... wetlands and lakes <u>for areas with a slope less than 15 degrees, and on those slopes exceeding 15 degrees where break feeding occurs</u> d. Requiring farming activities on slopes <u>exceeding 15 degrees (where break feeding does not occur) to manage contaminant discharges to water bodies</u>	Support in part	FFNZ agrees that stock exclusion provisions could be improved to ensure stock exclusion is affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to Schedule C which are broadly: <ul style="list-style-type: none"> - Linking the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion;

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>through mitigation actions that specifically target critical source areas.</u> AND AMEND to clarify how slope is measured.		<ul style="list-style-type: none"> - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue.
Buckley, Peter Ross Submitter ID: 71423	PC1-12584	Policy 1	AMEND Policy 1 to enable appropriate mitigation strategies to be adopted through a tailored Farm Environment Plan.	Support	FFNZ agrees with mitigations adopted through tailored plans.
Buckley, Peter Ross Submitter ID: 71423	PC1-12585	Policy 1	RETAIN Policy 1 managing diffuse discharges and water quality on a sub-catchment basis.	Support	FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ does not support allocation of contaminants to a property level and instead supports an approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere).
Cameron, Bruce Submitter ID: 60603	PC1-12586	Policy 1	RETAIN in Policy 1 the managing of diffuse discharges and water quality on a sub-catchment basis.	Support	FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ does not support allocation of contaminants to a property level and instead supports an approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Cameron, Bruce Submitter ID: 60603	PC1-12587	Policy 1	REPLACE Point (c) of Policy 1 with - "c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u> ". AND ADD an additional point to Policy 1 to read - " <u>d. Requiring farming activities on slopes exceeding 15 degrees (where break feeding does not occur) to manage contaminant discharges to water bodies through mitigation actions that specifically target critical source areas</u> ". AND AMEND to require clarification on how slope is measured given the ranges of topography experienced with each paddock and watercourses.	Support in part	FFNZ agrees that stock exclusion provisions could be improved to ensure stock exclusion is affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to Schedule C which are broadly: <ul style="list-style-type: none"> - Linking the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue.
Charion Investment Trust Submitter ID: 71344	PC1-7681	Policy 1	REVIEW Policy 1 /Policy 4 for consistency in relation to the policy test that applies to the enablement of low discharging activities.	Support in part	FFNZ agrees that policy 1 and 4 should not contradict each other when it refers to low discharge activities. FFNZ's submission on Variation 1 deletes Policy 1 a) which is the reference to low level of contaminant discharges . This is because FFNZ considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10776	Policy 1	AMEND Policy 1 to read: "Manage and require reductions in sub-catchment wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by: a. Enabling activities with a low level of contaminant discharge to water bodies	Support in part	Generally FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. This recognises the level of risk associated with these activities and likely small environmental gain when compared to the economic and social costs

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			provided those discharges do not increase;"		of complying with and enforcing more stringent rules. However the submission amendments do not address FFNZ concerns with policy 1. As set out in FFNZ submissions to Variation 1, FFNZ considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
Cotman, Jim Submitter ID: 59884	PC1-4585	Policy 1	WITHDRAW PPC1 AND REPLACE it with a new plan that endorses 'Best Practical Options' that are developed by landowners. AND AMEND to provide a new plan that supports the development and implementation of Catchment Management Plans that are led by landowners AND ENSURE that this new plan supports identifying potential critical source contaminant pathways on a sub-catchment basis to provide quantifiable measures and factual information into Catchment Management Plans. AND ENSURE that the new plan encourages innovative new science that provide alternative means to managing water quality AND ENSURE that the new plan recognises that well informed landowners as stewards of their land are the best and only people who can create action on the ground AND ENSURE the new plan approach favours a 'shared values'	Support	FFNZ considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1. FFNZ also supports a sub-catchment level focus rather than on a property basis. FFNZ supports a sub-catchment approach with action plans that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ supports adopting the best science and FFNZ considers that the appropriate course of action for managing discharges (rather than allocation of contaminants to a property level) is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1. FFNZ agrees that koi carp is a water quality issue and needs to be considered and addressed.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			approach where all parties work toward achieving sensible water quality targets. AND ENSURE that the primary focus of the new plan is a comprehensive programme to eliminate Koi Carp along with the native species predator, catfish. AND AMEND so that the NRP is not used as a surrogate for setting the rules.		Similar to the submitter FFNZ is opposed to NRP if it is used as a benchmark, grandparenting of N or to allocate N.
DairyNZ Submitter ID: 74050	PC1-10196	Policy 1	AMEND Policy 1 to read: "Policy 1: Manage diffuse and point source discharges of nitrogen, phosphorus, sediment and microbial pathogens/ Te Kaupapa... a. Enabling activities with a low level <u>or a managed low risk</u> of contaminant discharge to water bodies provided those discharges do not increase; and b. Requiring farming activities <u>to be managed through a tailored, risk-based approach, including:</u> i. <u>each farm and enterprise and demonstrating achievement of industry-agreed good management practice, and;</u> ii. <u>pastoral farms with moderate to high levels of nitrogen leaching over a specified amount contaminant discharge to water bodies, or for to reduce their nitrogen discharges; and...</u> c. Progressively excluding cattle, horses, deer, pigs from rivers, streams, drains, wetlands and lakes; <u>and"</u>	Support in part	FFNZ supports provisions for all discharges so that diffuse and point source discharges are treated equally and proportionally. As set out in FFNZ submissions to Variation 1, FFNZ considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1. FFNZ notes that many of the submitter's amendments aligns with FFNZ approach and principles. FFNZ supports minimum standards across all farming activities based on industry agreed good management practices. FFNZ supports provisions that require those who discharge above 75 th percentile to reduce to the 75 th percentile and an appropriate consenting pathway for those that are not able to reduce. However FFNZ does not support solely focussing on Nitrogen or solely focussing on pastoral farm discharges.
DairyNZ Submitter ID: 74050	PC1-12592	Policy 1	AMEND Policy 1 to read: " <u>...d. Analysing and reporting the effects of mitigation actions to demonstrate Objective 3 is achieved, and</u>	Support	FFNZ supports confirming that the 10 year targets are achieved and recognising that effective mitigations can take time to show the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>acknowledging time lags in the water and on the land."</u>		improvements where the water quality is measured.
Department of Conservation Submitter ID: 71759	PC1-10643	Policy 1	AMEND Policy 1 to replace " manage and require reductions " with " <u>reduce</u> ". AND AMEND to provide clear definition of the terms low, moderate and high levels of contaminant discharge or replace these terms with other clearly defined terms.	Oppose in part	FFNZ opposes the amendments as it would change policy 1 to requiring blanket reduction of all contaminants whether or not the attributes and values are already achieved in a subcatchment and without consideration for other relevant factors. Further the Values and Vision & Strategy are not simply about reducing contaminants e.g. wetlands, offsets, edge of field mitigations etc. FFNZ supports making provisions clear and certain for plan users by removing any ambiguity. However until FFNZ sees the replacement definitions it cannot support the changes.
FarmRight Submitter ID: 73720	PC1-5384	Policy 1	AMEND Policy 1(b) to read: "b. Requiring farming all activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges; and..." AND AMEND Policy 1 so 'moderate to high levels of contaminant discharge' means discharges of nitrogen, phosphorus, microbial pathogens and/or E.coli which exceed industry standard practice for contaminant loss for the relevant industry or rural sector or sub-sector.	Support	FFNZ agrees that there should be consistency in the approach to managing contaminants between all activities. FFNZ supports minimum standards across all farming activities based on industry agreed good management practices.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9707	Policy 1	AMEND Policy 1 to read: " Manage and require reductions in sub-catchment-wide <u>diffuse</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to water and where the sub-catchment is over allocated require reductions in these losses, by:</u>	Oppose in part	As set out in FFNZ submissions to Variation 1, FFNZ considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges-losses do not increase-reduce water quality or <u>compromise achievement of the water quality attribute targets in Table 3.11-1;</u> and</p> <p>b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges-losses where required so as <u>not to compromise achievement of the water quality attribute targets in Table 3.11-1;</u> and</p> <p>c. progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes."</p>		
Fletcher Trust Submitter ID: 73848	PC1-5892	Policy 1	AMEND to ensure Policy 1 is consistent with Policy 4 as it relates to the policy test that applies to the enabling of low discharge activities.	Support in part	FFNZ agrees that policy 1 and 4 should not contradict each other when it refers to low discharge activities. FFNZ's submission on Variation 1 deletes Policy 1 a) which is the reference to low level of contaminant discharges . This is because FFNZ considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10469	Policy 1	AMEND Policy 1 so the policy test that applies to the enablement of low discharging activities is consistent with Policy 4, amend to read: "...a) Enabling activities with a low level of contaminant discharge to water bodies <u>consistent with Policy 4</u> provided these discharges do not increase ; and..."	Support	FFNZ agrees that policy 1 should not undercut policy 4 when it relates to low discharge activities and the submitter's amendments will clarify the position..

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Genesis Energy Limited Submitter ID: 74052	PC1-8736	Policy 1	RETAIN Policy 1 (in same or similar form).	Oppose in part	As set out in FFNZ submissions to Variation 1, FFNZ oppose policy 1 and considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
Gleeson, Graeme B Submitter ID: 73800	PC1-12600	Policy 1	AMEND Policy 1 to adopt a sub-catchment approach to focus on contaminants important to each farm and sub-catchment. AND AMEND the rules to ensure low contaminant loss land uses are a permitted activity. AND AMEND to ensure horticultural nitrogen losses are managed in a manner that recognises the value of the industry to the community.	Support	FFNZ agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ supports a sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. Generally FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. This recognises the level of risk associated with these activities and likely small environmental gain when compared to the economic and social costs of complying with and enforcing more stringent rules.
Gleeson, Graeme B Submitter ID: 73800	PC1-12601	Policy 1	AMEND Policy 1 to ensure Farm Environment Plans assess appropriate land use options for each farm, and encourage better science to determine which contaminants are of concern for each farm and sub-catchment.	Support in part	FFNZ supports tailored actions in each FEP and using science and land use options as decision support tools in preparing FEPs. For avoidance fo doubt FFNZ opposes land use as a mechanism to allocate nitrogen.
Gleeson, Graeme B Submitter ID: 73800	PC1-12602	Policy 1	Policy 1 - DEVELOP greater understanding about spatial location of natural resources so this knowledge can be applied to better inform and manage contaminant loss.	Support in part and oppose in part	FFNZ supports measures to close the currently gaps in understanding and knowledge to better manage contaminant loss. This is one of the reasons why FFNZ does not support the 80 years numeric targets and considers as knowledge and information becomes available better and more

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND or ADD new rules that are based on land class and pasture production capability, where land use is supported by the capability of the land giving rise to contaminant loss no greater than acceptable ecosystem health limits. OR ADOPT equal nitrogen allocation flexibility for all land users (at 20kgN/ha) as a permitted activity.</p>		<p>accurate targets can be progressively set to reach long term aims.</p> <p>FFNZ opposes new rules that allocates contaminants based on land class and pasture production capability. Amongst other reasons, land use classification was not designed for measuring contaminant leaching and as a result the relationship between land use and contaminants are unreliable. For instance the amount of Nitrogen leached from land is due to a wide range of factors which does not form part of land use classification.</p> <p>FFNZ considers that a “permitted baseline” ought to be provided, either 15kgN (with farming activities able to increase up to it) or some other reasonable measure). FFNZ would support that baseline being 20kgN if it was supported by the science.</p>
<p>Gleeson, Graeme B Submitter ID: 73800</p>	<p>PC1-6428</p>	<p>Policy 1</p>	<p>DELETE Policy 1 requirements to manage farming activities to a historic Nitrogen Reference Point AND REPLACE with live weight standards linked to the natural capital of soils, climate and assimilative capacity of water OR allocate nitrogen as it is tied to the natural capital of soils. AND DELETE 75th percentile nitrogen leaching value AND REPLACE with requirements and standards that ensure the reductions required in over-allocated catchments, and where nitrogen is an issue, are proportionate to the level of improvement required and the impact of the discharge. Highest dischargers</p>	<p>Oppose in part</p>	<p>FFNZ’s position on the NRP is that it should not be used as benchmark, grandparenting of N or to allocate N. FFNZ considers that it can be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase e.g. permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters. On these provisos, FFNZ supports the NRP.</p> <p>FFNZ opposes live weight standards and allocation of nitrogen based on natural capital of soils. Amongst other reasons, land use classification based on soil was not designed for measuring contaminant leaching and as a result the relationship between land use and</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>should be targeted first and consideration should be given to the economic implications of reducing and the timeframe for making reductions. AND AMEND to ensure that high nitrogen dischargers, except horticulture, are required to reduce over time, starting immediately, and achieving 10% reductions every year for the life of PPC1.</p>		<p>contaminants are unreliable. The amount of Nitrogen leached from land is due to a wide range of factors many which does not form part of land use classification.</p> <p>FFNZ opposes the submission on the 75th percentile and replacement provisions as FFNZ supports provisions that require those who discharge above 75th percentile to reduce to the 75th percentile as part of its framework as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ has concerns that if the approach was adopted such that the highest nitrogen discharges had to reduce that would not take into account their particular circumstances e.g. a good farm system on leaky soils or high rainfall could be twice the nitrogen number of a poor farm system on better soils and low rainfall. It is not necessarily the high nitrogen farm that should or is able to reduce. FFNZ considers that funding and timeframes and/or a reasonable consenting process would need to be considered and available.</p> <p>FFNZ does not support a one size fits all approach that requires 10% reductions (or something similar). FFNZ considers that a tailored approach ought to be adopted.</p> <p>FFNZ considers that issues arising from the over-allocation of nutrients or contaminants can generally be addressed in ways other than allocation, such as the implementation of good management practices (and MPA).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Greenplan Holdings Limited Submitter ID: 73893	PC1-2910	Policy 1	AMEND Policy 1 to identify point sources through targeted, evidence-based data, and work to reduce or mitigate them over time through better management practices. AND MAKE any consequential amendments.	Support	FFNZ agrees that there should be consistency in the approach between point source and diffuse discharge. FFNZ considers that issues arising from the over-allocation of nutrients or contaminants can generally be addressed in ways other than allocation, such as the implementation of good management practices (and MPA).
Greenplan Holdings Limited Submitter ID: 73893	PC1-12605	Policy 1	AMEND Policy 1 to ensure the national stock exclusion policy is followed AND AMEND to extend the timeframes for stock exclusion AND MAKE any consequential amendments.	Support in part	FFNZ considers that provisions about stock exclusion should be affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that: <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5378	Policy 1	AMEND Policy 1 to reflect amendments to the rules requiring all farming activities to adopt the Best Practicable Option.	Oppose in part	FFNZ considers that the appropriate course of action for managing discharges is by adopting Most Practicable Actions for diffuse discharge and Best Practicable Options for point source discharge. However, FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.
Hill Country Farmers Group	PC1-7713	Policy 1	AMEND Policy 1 to read: "...c. Progressively excluding cattle,	Oppose in part	FFNZ considers that provisions about stock exclusion should be affordable, practical and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73321			<p>horses, deer and pigs from rivers, streams, drains, wetlands and lakes <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</u></p> <p><u>d. Requiring farming activities on slopes exceeding 15 degrees (where break feeding does not occur) to manage contaminant discharges to water bodies through mitigation actions that specifically target critical source areas.</u></p> <p>AND AMEND the stock exclusion fencing requirement to align with proposed amendments to NPS-FM.</p> <p>AND AMEND to provide clarification in rules and schedules of slope interpretation (i.e. how slope is measured) and associated mandatory fencing requirements.</p>		<p>sustainable. FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that:</p> <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10050	Policy 1	<p>AMEND Policy 1 to achieve the intent of the following revisions:</p> <p>"a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase; and</p> <p>b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce <u>the effect of their discharges through on-farm and/or off-farm actions;</u></p> <p><u>ba. Enabling collective action at a catchment scale by groups seeking to manage discharges as a single entity;</u></p> <p><u>and</u></p> <p><u>bb. Providing criteria for the approval of natural resource accounting systems</u></p>	Support in part	<p>FFNZ supports that reduction of contaminants can be managed by adopting practical actions and options (MPAs and BPOs in FFNZs submission to variation 1).</p> <p>FFNZ supports sub-catchment groups with group action plans to improve water quality in the sub-catchment. However, it has concerns about an approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ's concerns include that this may devolve power to a particular group, may not result in water quality improvements and may impose significant cost.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>used to enable catchment or sub-catchment based approaches;</u> <u>bc. Providing a table of ten-year sub-catchment load targets for the four contaminants (Schedule C Table XX),</u> <u>c. Progressively excluding cattle, horses, deer and pigs from rivers, stream, drains wetlands and lakes."</u></p>		
<p>Lakes and Waterways Action Group Trust (LWAG) Submitter ID: 53342</p>	<p>PC1-4071</p>	<p>Policy 1</p>	<p>AMEND Policy 1 so that freshwater objectives (broad numerical) are included from the catchment (or Freshwater Management Unit) to sub-catchment level that are not set lower than current water quality.</p>	<p>Support in part</p>	<p>FFNZ considers that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. However FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years (never mind shortening the overall time frame) when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others</p>
<p>Lichtwark, Quintin Owen Submitter ID: 72535</p>	<p>PC1-1860</p>	<p>Policy 1</p>	<p>ADD a NEW clause to Policy 1 to set out the course of action to implement Objective 3 AND AMEND Policy 1 to read: "Policy 1: Manage diffuse and <u>point source discharges</u> of nitrogen, phosphorus, sediment and microbial pathogens/Te reo translation Manage and require reductions in sub-catchment-wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by: a. Enabling activities with a low level <u>or a managed low risk</u> of contaminant discharge to water bodies provided those discharges do not increase; and</p>	<p>Support in part</p>	<p>FFNZ supports providing for policies to set the course of action for achieving the 10 year targets in objective 3.</p> <p>FFNZ supports provisions for all discharges so that diffuse and point source discharges are treated equally and proportionally.</p> <p>As set out in FFNZ submissions to Variation 1, FFNZ considers that the appropriate course of action for managing discharges is by adopting Most Practicable Actions for diffuse discharge and Best Practicable Options for point source discharge.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges; and to be managed through a tailored, risk-based approach, including;</p> <p>i. each farm and enterprise and demonstrating achievement of industry-agreed good management practice, and;</p> <p>ii. pastoral farms with moderate to high levels of nitrogen leaching over a specified amount contaminant discharge to water bodies, or for to reduce their nitrogen discharges; and</p> <p>c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes; and</p> <p>d. Analysing and reporting the effects of mitigation actions to demonstrate Objective 3 is achieved, and acknowledging time lags in the water and on the land."</p>		<p>FFNZ supports minimum standards across all farming activities based on industry agreed good management practices.</p> <p>FFNZ supports a reduction for high levels of discharge. As part of FFNZ's framework as set out in FFNZ's submission to Variation 1 it requires those who discharge above 75th percentile to reduce to the 75th percentile and an appropriate consenting pathway for those that are not able to reduce.</p> <p>FFNZ supports confirming that the 10 year targets are achieved and recognising that effective mitigations can take time to show the improvements where the water quality is measured.</p>
Matahuru Farms Ltd Submitter ID: 73768	PC1-6987	Policy 1	<p>AMEND Policy 1(c) to cap mandatory fencing at 15 degree slopes as per the national recommendations AND AMEND so that for areas over 15 degrees slopes mitigations other than fencing can be utilised, as identified through Farm Environment Plans AND AMEND to provide 50 per cent funding of all mandatory fencing for stock exclusion AND financially assist water reticulation projects.</p>	Oppose in part	<p>FFNZ considers that provisions about stock exclusion should be affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that:</p> <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord;

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<ul style="list-style-type: none"> - Allow for alternative mechanism through FEP that addresses issue. <p>FFNZ would support an approach that considers the use of incentives and other public funds to provide compensation where there is a public good.</p>
Miraka Limited Submitter ID: 73492	PC1-8810	Policy 1	AMEND Policy 1(b) to read: " <u>Requiring all farming activities to apply best management practices to mitigate the discharge of contaminants to water bodies.</u> "	Support in part	As set out in FFNZ submissions to Variation 1, FFNZ considers that the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge.
Moerangi Trust Submitter ID: 73111	PC1-4287	Policy 1	AMEND Policy 1 to provide for a change to the slope requirements to 15 degrees as per the National Water Accord AND CONSIDER subsidising fencing waterways and contaminant mitigation AND AMEND to provide for science to determine the necessity of fencing of water bodies, based on their current level of contamination, stocking rate and the proven impact of fencing of water bodies.	Oppose in part	<p>FFNZ considers that provisions about stock exclusion should be affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that:</p> <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue. <p>FFNZ would support an approach that considers the use of incentives and other public funds to provide compensation where there is a public good.</p>
Moerangi Trust	PC1-12626	Policy 1	AMEND Policy 1 to ensure Farm Environment Plans present mitigations	Support	FFNZ considers that getting the policy context right and allowing the assessment on a case by

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73111			against contaminants, relevant to each farm, rather than a blanket approach.		case basis of activities is the appropriate means to address issues. For these reasons FFNZ agrees with the submitter to remove a "blanket approach".
Moerangi Trust Submitter ID: 73111	PC1-12627	Policy 1	AMEND Policy 1 to provide for a change to the definition of a waterway to that of the National Water Accord.	Support in part	FFNZ understand that the submission point refers to the definition of waterway as it relates to stock exclusion. FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities and also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain and requiring all stock to be excluded from all water bodies will impose significant cost for no net benefit.
New Zealand Steel Ltd Submitter ID: 73790	PC1-3699	Policy 1	AMEND Policy 1 to make it clear that it is the overall effect of the discharge that is not increasing.	Support	FFNZ agrees that the appropriate approach is on the overall effects of the discharge.
NZ Transport Agency Submitter ID: 73542	PC1-4829	Policy 1	AMEND Policy 1 as follows: "Manage and require reductions in sub-catchment-wide discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>from farming activities</u> , by..."	Oppose	All discharges should be treated equally and proportionally. FFNZ oppose excluding discharges because they are not from farming activities. The submitter's approach is not effects based.
O.M and P.R Houchen Ltd Submitter ID: 71655	PC1-12638	Policy 1	Policy 1 - AMEND the Nitrogen Reference Point provisions of PPC1 so they are flexible for hill country.	Support in part	FFNZ considers that Nitrogen Reference Point should not be used as benchmark, grandparenting of N or to allocate N. FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6395	Policy 1	<p>AMEND Policy 1 to read: "Manage and require Achieve reductions in sub-catchment-wide <u>diffuse</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>from farming activities</u>, by: a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase; <u>Requiring farming activities with a low level of contaminant discharge to water bodies to progressively exclude livestock (not including sheep) from rivers, streams, drains, wetlands and lakes</u> and b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to adopt the Best Practicable Options to reduce or mitigate their discharges; and e. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes."</p> <p>OR AMEND to redraft the policy to reflect the alternative approach proposed in the submission to regulate land use on the basis of the Best Practicable Option and work toward allocation on a land use suitability approach [overview of the alternative approach in Table 2 of submission].</p>	Oppose in parts	<p>FFNZ opposes the amendments that seeks only achieving reductions as it would change policy 1 to requiring blanket reduction of all contaminants whether or not the attributes and values are already achieved in a subcatchment and without consideration for other relevant factors. The Values and Vision & Strategy are not simply about reducing contaminants e.g. wetlands, offsets, edge of field mitigations etc</p> <p>Diffuse and point source discharges should be treated equally and proportionally. FFNZ also oppose excluding discharges because they are not from farming activities. The submitter's approach is not effects based.</p> <p>FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities and also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain and requiring all stock to be excluded form all water bodies will impose significant cost for no net benefit.</p> <p>FFNZ supports that point source discharges adopts best practicable options while diffuse discharges adopts most practicable actions (as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ opposes the submitter's alternative approach which is the use of Land use as mechanism or method to allocate contaminants. Amongst other reasons, LUC was not designed for contaminant leaching and as a result the</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>relationship between LUC and contaminants are unreliable. The amount of contaminants leached from land is due to a wide range of factors many which does not form part of LUC.</p> <p>FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality , amongst others.</p>
Primary Land Users Group Submitter ID: 71427	PC1-11143	Policy 1	Policy 1 - CONSIDER developing an improved measuring programme to gain more reliable data AND AMEND to clarify the definition of 'do not increase.'	Support	FFNZ supports measures to close the currently gaps in understanding and knowledge to better manage contaminant loss. This is one of the reasons why FFNZ does not support the 80 years numeric targets and considers as knowledge and information becomes available better and more accurate targets can be progressively set to reach long term aims.
Primary Land Users Group Submitter ID: 71427	PC1-12643	Policy 1	<p>AMEND Policy 1(c) to read: 'Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes "<u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u>".'</p> <p>AND ADD a new point (d) to read "<u>Requiring farming activities on slopes exceeding 15 degrees (where break feeding does not occur) to manage contaminant discharges to water bodies through mitigation actions that specifically target critical source areas.</u>"</p> <p>AND AMEND to develop interpretation guidance of the rules and Schedule C in relation to determining slope and mandatory fencing requirements.</p>	Oppose in part	<p>FFNZ considers that provisions about stock exclusion should be affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that:</p> <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7777	Policy 1	RETAIN Policy 1.	Support in part	As set out in FFNZ submissions to Variation 1, FFNZ seeks policy 1 to be retained with amendments because the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10549	Policy 1	RETAIN Policy 1.	Support in part	As set out in FFNZ submissions to Variation 1, FFNZ seeks policy 1 to be retained with amendments because the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
Ravensdown Limited Submitter ID: 74058	PC1-10101	Policy 1	RETAIN the intent of Policy 1 while AMENDING it to read: "Manage and required reductions in sub-catchment-wide discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>and where over-allocated required reductions in these discharges, by:</u> "	Support in part	As set out in FFNZ submissions to Variation 1, FFNZ seeks policy 1 to be retained with amendments because the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
Reeves and Taylor, James Gordon Livingston and Amy Louise Submitter ID: 71614	PC1-12644	Policy 1	AMEND Policy 1 (c) to read: "Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands, and lakes <u>all waterbodies more than 1m wide that hold water year round</u> " (or any other definition that provides better clarity as to what actually constitutes a waterbody).	Support in part	FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities and also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain and requiring all stock to be excluded from all water bodies will impose significant cost for no net benefit.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11098	Policy 1	AMEND PPC1 to define or explain what is meant by 'low level of contaminant discharge' and 'high levels of contaminant discharge'.	Oppose in part	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity. However until FFNZ has an opportunity to consider the replacement definitions it cannot support the new definitions.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
South Waikato District Council Submitter ID: 72892	PC1-4036	Policy 1	AMEND Policy 1 to incorporate an agreed, measurable and enforceable baseline for each of the four diffuse discharges from which these general terms can be measured or benchmarked.	Oppose in part	FFNZ considers that a “permitted baseline” ought to be provided for low emitters but FFNZ oppose using a baseline to benchmark. FFNZ considers that a baseline should be used simply to indicate where farmers are at presently and as a trigger point for decisions on contaminant increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.
Spectrum Dairies Limited Partnership Submitter ID: 73958	PC1-2741	Policy 1	Policy 1: AMEND PPC1 to provide greater clarity for farms and more objectivity regarding land use change AND AMEND Policy 1 to reconsider the economic outfall and value loss from people leaving farming AND AMEND to include logical solutions that have positive economic and environmental effects AND undertake wider consultation, on a farm by farm basis.	Support	FFNZ agrees that there needs to be more flexibility for land use change. Another of the submitter’s concerns appear to be that the effects on economic and community wellbeing has not been appropriately considered. If this is correct, FFNZ shares these concerns and seeks that the relief sought is allowed. FFNZ considers that the appropriate course of action for managing discharges is by adopting practicable actions (MPA) for diffuse discharge and practicable options (BPO) for point source discharge rather than the matters listed in a) to c) of Policy 1.
Taupo District Council Submitter ID: 74207	PC1-8108	Policy 1	RETAIN the intent of Policy 1.	Support in part	As set out in FFNZ submissions to Variation 1, FFNZ seeks policy 1 to be retained with amendments because the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11778	Policy 1	RETAIN Policy 1.	Support in part	As set out in FFNZ submissions to Variation 1, FFNZ seeks policy 1 to be retained with amendments because the appropriate course of action for managing discharges is by adopting

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8236	Policy 1	AMEND Policy 1 to clarify what 'low level of contaminant discharge' is.	Support in part	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity. However until FFNZ has an opportunity to consider the replacement definitions it cannot fully support the submission point.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10272	Policy 1	RETAIN Policy 1.	Support in part	As set out in FFNZ submissions to Variation 1, FFNZ seeks policy 1 to be retained with amendments because the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3304	Policy 1	RETAIN Policy 1.	Support in part	As set out in FFNZ submissions to Variation 1, FFNZ seeks policy 1 to be retained with amendments because the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
Waikato Regional Council Submitter ID: 72890	PC1-2996	Policy 1	RETAIN Policy 1.	Support in part	As set out in FFNZ submissions to Variation 1, FFNZ seeks policy 1 to be retained with amendments because the appropriate course of action for managing discharges is by adopting MPAs for diffuse discharge and Best Practicable Options for point source discharge rather than the matters listed in a) to c) of Policy 1.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11272	Policy 1	AMEND Policy 1 to read: "Manage and require <u>maintenance and/or reductions as relevant</u> in sub-catchment wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by:..."	Support in part	FFNZ considers that there may be times where "maintain" is the appropriate metric. FFNZ supports an amendment to Policy 1 that records the requirement to maintain. FFNZ also supports the additional phrase "as relevant" in the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND Policy 1 by adding a new final paragraph: " <u>Encouraging enterprises to apply for sub-catchment management resource consents for farming activities and commercial vegetable production, associated diffuse discharges, and land use change.</u> "		submitter's Policy 1 amendments because sometimes not all of the combinations of alternatives are relevant or should be used. FFNZ does not support sub-catchment collectives managing resource consent for reasons including that this is likely to involve allocation (FFNZ does not support allocation), potentially gives significant power to catchment collectives, the potential for abuse of that power and the potential significant cost.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2084	Policy 1	REPLACE Policy 1(b) with the following: " <u>Requiring all farming activities to apply Best Management Practices to mitigate the discharge of all contaminants to water bodies (nitrogen, phosphorus, sediment and microbial pathogens).</u> "	Oppose in part	FFNZ supports minimum standards across all farming activities based on industry agreed good management practices. However it should be flexible enough so that alternative actions may be identified in tailored FEPs. FFNZ considers the submitters proposal will result in more stringent provisions.
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-9505	Policy 2	AMEND Policy 2d) to read: " <u>Require reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens by the dischargers (progressively from the highest to the least) to the extent necessary to meet the scale of water quality improvement required in the sub-catchment [Reductions will be required from the highest dischargers until the water quality target is met].</u> "	Oppose	FFNZ opposes the submission point because FFNZ considers Policy 2d) should be proportionate in the context of several factors. This is needed both to achieve the environmental outcomes and to achieve them at lowest social and economic cost. FFNZ considers that the discharge must be proportionate to the amount of the discharge, the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy and values and the particular sub-catchment characteristics. FFNZ has concerns that if the approach was adopted such that the highest nitrogen discharges had to reduce that would not take into

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					account their particular circumstances e.g. a good farm system on leaky soils or high rainfall could be twice the nitrogen number of a poor farm system on better soils and low rainfall. It is not necessarily the high nitrogen farm that should or is able to reduce.
Alcock and Easton, Jo and John Submitter ID: 73374	PC1-12681	Policy 2	<p>AMEND Policy 2 to use Farm Environment Plans to determine what would work best on each farm AND AMEND to use science to determine which contaminants are an issue in each sub-catchment AND AMEND to provide for Farm Environment Plans only in sub-catchments where science indicates improvements are required AND AMEND to ensure Farm Environment Plans are written to allow flexibility with nitrogen discharges and application of good management practices AND AMEND to ensure Farm Environment Plans are tailored to the individual properties and focus on critical source management rather than applying blanket regulatory standards AND AMEND to convene an independent panel to address points between staff and farmers in Farm Environment Plans without the cost of appeal to the Environment Court.</p>	Support	<p>FFNZ supports an approach based on considering sub-catchment characteristics and tailored and proportionate actions in FEPs. AND FFNZ also supports a targeted approach that targets the contaminant that is of greatest issue in a subcatchment (as opposed to a blanket approach of reducing all contaminants everywhere).</p> <p>AND FFNZ also supports flexibility in Farm Environment Plans. FFNZ I its Submission on Variation 1 have suggested amendments to provisions in order to make FEPs more flexible.</p> <p>AND FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ's provisions in its submission on Variation 1 seeks that FEPs are prepared by certified farm environment planners and if prepared in accordance with Schedule 1 then Council does not have control over the content of FEPs. However FFNZ will support any other reasonable mechanism to avoid litigation costs and cost effective resolution of disputes. FFNZ considers that a dispute resolution process ought to be</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.
A S Wilcox & Sons Ltd Submitter ID: 73142	PC1-4309	Policy 2	AMEND Policy 2 to provide alternatives to the Nitrogen Reference Point during the transitional period. AND AMEND Policy 2 to enable a consenting pathway for groups to take responsibility for contaminant reductions through catchment and paddock scale mitigations that are able to be measured and reported.	Support in part	<p>In principle, FFNZ does not have a problem with the Nitrogen Reference Point as long as it is not used as a benchmark, for grandparenting of N or to allocate N.</p> <p>FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.</p> <p>FFNZ consider that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ supports sub-catchment groups with group action plans to improve water quality in the sub-catchment. However, it has concerns about an approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives.</p>
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6122	Policy 2	AMEND Policy 2(d) as follows: "d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchments <u>which is capable of being achieved in the short-term taking into account the particular characteristics of each sub-catchment;...</u> "	Support	FFNZ considers Policy 2d) should be proportionate in the context of several factors when reducing discharges including characteristics of each sub-catchment and ought to recognise potential offset mitigation which will achieve the degree of reduction.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND ADD a NEW clause da. as follows: <u>"da. Providing for and allowing opportunity for offset mitigation between properties or enterprises which will achieve the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens proportionate to the amount of current discharge and proportionate to the scale of water quality improvement required in the sub-catchments capable of being achieved in the period to 2026, taking into account the particular characteristics of each sub-catchment."</u>		
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10876	Policy 2	AMEND Policy 2 to ensure consistency with the amendments sought in Appendix 1 of this submission AND AMEND Policy 2(d) to read: "d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment in <u>accordance with the short and long term targets in Table 3.11-1, the sub-catchment reduction targets and timeframes in Table 3.11-2, and the sub-catchment nitrogen leaching requirements in Schedule E.; and..."</u>	Oppose	FFNZ considers Policy 2d) should be proportionate in the context of several factors when reducing discharges. This is needed both to achieve the environmental outcomes and to achieve them at lowest social and economic cost. FFNZ considers that the discharge must be proportionate to the amount of the discharge, the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy and values and the particular sub-catchment characteristics. For these and other reasons FFNZ opposes the submission point.
Auckland/Waikato Fish and Game and	PC1-12692	Policy 2	AND AMEND Policy 2(a) to read: "a. Taking a tailored, risk based approach to define mitigation actions on the land	Oppose	FFNZ does not consider that mitigations in a FEP should be conditions of a resource consent. FFNZ seeks that the actions and timing in FEPs

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Eastern Region Fish and Game Submitter ID: 74085			that will reduce which will achieve required reductions specified in this plan in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a Farm Environment Plan either associated with as part of a resource consent; or in specific requirements established by participations in a Certified Industry Scheme; AND DELETE Policy 2(b).		are not conditions of consent. This is to provide flexibility to ensure that farming activities appropriately manage and respond to things such as adverse weather events, health and safety or animal welfare risks etc. FFNZ seeks the retention of Policy 2(b).
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-12693	Policy 2	ADD a NEW clause (f) to Policy 2 to read: <u>"f. Promoting the use of riparian buffers to avoid sediment discharge."</u>	Oppose	FFNZ considers that the provisions around riparian buffering in the proposed plan change is already too stringent and accordingly oppose the submission to make such provision even more stringent.
Bailey, James Submitter ID: 73926	PC1-9019	Policy 2	AMEND Policy 2 to replace the 'staged' approach with an 'Adaptive Management' approach to managing nitrogen and all contaminants AND AMEND PPC1 to recognise Land Use Suitability and Natural Capital as the basis of nitrogen management AND AMEND to enable transition toward the Vision and Strategy with Land Use Suitability as a starting point and using Adaptive Management as our understanding develops, reviewing and adapting through subsequent plan changes AND AMEND PPC1 to apply Land Use Suitability and Natural Capital now by including allocation based on the Natural	Oppose in part	FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available. If this is not the intent of the submitter than we oppose the submission point. AND FFNZ opposes Land Use Suitability and Natural Capital as the basis of nitrogen management. Amongst other reasons, LUC was not designed for Nitrogen leaching and as a result the relationship between LUC and nitrogen is unreliable. The amount of Nitrogen leached from land is due to a wide range of factors which does not form part of LUC. For the same reason FFNZ opposes LUC as allocation mechanism.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			Capital of soils through a Land Use Capability approach AND AMEND to use the sub-catchment approach by incentivising the development of catchment groups to work alongside Council to identify and target contaminant hot spots.		FFNZ supports a sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere).
Bailey, James Submitter ID: 73926	PC1-12696	Policy 2	DELETE the Policy 2 requirement to manage property level discharges to a Nitrogen Reference Point based on historic profiles AND AMEND to provide a flexibility cap for low leaching farm systems below a certain threshold (20kg/N/ha/yr) that is deemed as a sustainable level for the transition period, with farmers with a Nitrogen Reference Point below this enabled to increase up to this point.	Support in part	FFNZ opposes the Nitrogen Reference Point if it is used as benchmark, for grandparenting of N or to allocate N. FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters. FFNZ considers that a “permitted baseline” ought to be provided, either 15kgN (with farming activities able to increase up to it) or some other reasonable measure). FFNZ would support that baseline being 20kgN if it was supported by the science.
Bailey, James Submitter ID: 73926	PC1-12697	Policy 2	AMEND Policy 2 to place a strong emphasis on identifying and addressing critical source areas through the farm planning process.	Support	FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ’s submission on Variation 1.
Bailey, James Submitter ID: 73926	PC1-12698	Policy 2	AMEND Policy 2 to make stock exclusion consistent with central Government's recommendations being proposed through the advice of the Land and Water Forum.	Oppose in part	FFNZ considers that provisions about stock exclusion should be affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>improvements to stock exclusion provisions broadly along the lines that:</p> <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue. <p>FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities and also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain and requiring all stock to be excluded form all water bodies will impose significant cost for no net benefit.</p>
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-12699	Policy 2	ADOPT Policy 2 as notified AND AMEND (d) to read: "Requiring the degree of reduction... required in the sub-catchment, with reductions guided by mitigations <u>actions specified in a Farm Environment Plan and through implementation of Best Management Practices.</u> " and AND AMEND (e) to read: "Requiring stock exclusion to be... provided to the Council, or in any case <u>cases involving properties comprising extensive hill country and where alternative mitigation measures for areas with a slope exceeding 25 degrees area required</u> , no later than 1 July 2026."	Support in part	<p>Policy 2d) FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.</p> <p>Policy 2e) FFNZ has concerns with the provisions about completion of stock exclusion. FFNZ considers that a reasonable and realistic approach is to change the date for stock exclusion and set backs to 1 July 2028. It considers that this lines up well with the other date changes and with the likely Schedule 1 process under the RMA (in that it will take some time to result Plan Change 1 and that will involve clarification of issues like the conflict in Schedule C and 1).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.		
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6862	Policy 2	ADOPT Policy 2 as notified AND AMEND (d) to read: "Requiring the degree of reduction... required in the sub-catchment, with reductions guided by mitigations <u>actions specified in a Farm Environment Plan and through implementation of Best Management Practices.</u> " and AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	Support in part	FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.
Balle Bros Group Submitter ID: 67834	PC1-11401	Policy 2	AMEND Policy 2 to read: 'Policy 2: Tailored approach to " <u>managing and where relevant</u> " reducing diffuse discharges from farming activities... Manage and " <u>where relevant</u> " require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming activities on properties and enterprises by: ... c. " Establishing a Nitrogen Reference Point for the property or enterprise "; and d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens " <u>where required</u> " to be proportionate to the amount... e. Requiring stock exclusion " <u>for areas with a slope of less than 15 degrees and</u>	Support in part	FFNZ considers that there may be times where maintaining water quality is the appropriate metric and supports that discharges only needs to reduce when relevant. FFNZ supports an amendment to Policy 2 that records "where relevant" . FFNZ opposes the Nitrogen Reference Point if it is used as benchmark, for grandparenting of N or to allocate N. FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters. FFNZ supports the additional phrase "where required" for the same reasons as "where relevant".

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>on those slopes exceeding 15 degrees where break feeding occurs" to be completed within 3 years...'</u></p>		<p>FFNZ considers that provisions about stock exclusion should be affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope and has concerns with the completion dates. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that:</p> <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue
<p>Beef + Lamb New Zealand Limited Submitter ID: 73369</p>	<p>PC1-11487</p>	<p>Policy 2</p>	<p>AMEND Policy 2 so that management approaches are tailored to managing water quality on a sub-catchment basis. Reductions may not always be required AND AMEND to incentivise and support collaborative community groups working together to sustainably manage land and water resources and to implement a staged approach to achieving the Objective of PPC1, through long term global sub-catchment land use and discharge permits, including land use change AND AMEND PPC1 to adopt the recommendations released in the government's clean water document (<i>New Zealand Government Clean Water (February 2017) Ministry for the Environment, ME 1293</i>).</p>	<p>Support in part</p>	<p>FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level and tailored to fit each sub-catchment characteristic.</p> <p>FFNZ also agrees that reductions may not always be required.</p> <p>FFNZ supports collaborative community groups working together to sustainably manage land and water resources.</p> <p>FFNZ also supports a staged approach where as knowledge and information becomes available better and more accurate targets can be progressively set to reach long term aims while a start is made by setting short term targets.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>FFNZ has concerns about an approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ's concerns include that this may devolve power to a particular group, may not result in water quality improvements and may impose significant cost. FFNZ also oppose inflexible land use change provisions.</p> <p>The submitter did not provide particulars on the recommendations in the government's clean water document and how it would be adopted and joined with the proposed provisions. In regards to stock exclusion FFNZ considers the that stock exclusion based on a slope criteria is too uncertain and requiring all stock to be excluded form all water bodies will impose significant cost for no net benefit. In regards to other recommendations without further particulars from the submitter FFNZ opposes adopting the recommendations amongst other reasons because there has been no evaluation whether the recommendations are the most appropriate way to achieve the objectives of PC1 and values of the Vision & Strategy nor have FFNZ been provided with details of the scale and significance of the environmental, economic, social and cultural effects on the Waikato region.</p>
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-12708	Policy 2	AND AMEND Policy 2 (e) as follows: "Requiring stock exclusion <u>the exclusion of stock from permanently flowing waterbodies on land up to 15 degrees slope, and stock when break fed on land with a slope exceeding 15 degrees slope.</u> to be completed within 3 years following	Oppose in part	FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities and also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026."		Also FFNZ has concerns with the provisions about completion of stock exclusion. FFNZ considers that a reasonable and realistic approach is to change the date for stock exclusion and set backs to 1 July 2028. It considers that this lines up well with the other date changes and with the likely Schedule 1 process under the RMA (in that it will take some time to result Plan Change 1 and that will involve clarification of issues like the conflict in Schedule C and 1).
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-12709	Policy 2	AMEND Policy 2 to reflect the amendments set out against Policy 1 which relate to the management of Nitrogen discharges and allocation, and which enable flexibility for low discharging land uses.	Oppose in part	See FFNZ's reasons in response to submitter's points on the management of Nitrogen discharges and allocation, and which enable flexibility for low discharging land uses in policy 1.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-12710	Policy 2	AMEND Policy 2(a) as follows: "Taking a tailored, risk based approach to define mitigation actions on the land that will reduce to manage diffuse discharges of Nitrogen, Phosphorus, sediment and microbial pathogens..." AND AMEND Policy 2 and PPC1 to ensure that management approaches for hill country are focused on critical source management with timeframes tailored through Farm Environment Plans.	Support	FFNZ agrees that reductions may not always be required. FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-12711	Policy 2	DELETE Policy 2 (d) AND REPLACE with: " <u>where current water quality is over allocated such that the water quality outcome in the sub-catchment, as set out in Table 3.11-1 is not met, require reductions in the contaminant discharge to be proportionate to the amount of the current discharge (those discharging</u>	Support in part	FFNZ agrees that the discharge must be proportionate to the amount of the discharge, values and the particular sub-catchment characteristics but states it also has to be proportionate to the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment, to provide for the values."</u></p> <p>AND AMEND Policy 2 to apply Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and require the application of best practicable option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.</p>		<p>FFNZ generally will support provisions that seek that diffuse and point source discharges are treated equally and proportionally. However due to the lack of particulars of how to apply policy 12 and 13 to policy 1, FFNZ can only go as far as state that to the extent that applying policy 12 and 13 to policy 1 aligns with FFNZ's submission on PC1 and Variation 1 FFNZ supports it else it opposes it.</p> <p>FFNZ opposes provisions that seeks the actions and timing in FEPs are conditions of a resource consent. This is to provide flexibility to ensure that farming activities appropriately manage and respond to things such as adverse weather events, health and safety or animal welfare risks etc.</p>
Buckley, Peter Ross Submitter ID: 71423	PC1-1397	Policy 2	RETAIN Policy 2 as appropriate mitigation strategies through a tailored Farm Environment Plan.	Support in part	FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.
Buckley, Peter Ross Submitter ID: 71423	PC1-12721	Policy 2	AMEND PPC1 to adopt a sub-catchment approach.	Support in part	FFNZ agrees that contaminants are more appropriately targeted at a sub-catchment level and tailored to fit each sub-catchment characteristic.
Buckley, Peter Ross Submitter ID: 71423	PC1-12722	Policy 2	Policy 2 - DELETE the Nitrogen Reference Point from the rules.	Oppose in part	<p>FFNZ opposes Nitrogen Reference Point if it is as benchmark, grandparenting of N or to allocate N.</p> <p>FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Cameron, Bruce Submitter ID: 60603	PC1-12724	Policy 2	RETAIN Policy 2 AND AMEND the rules in PPC1 to remove the Nitrogen Reference Point.	Support in part Oppose in part	FFNZ opposes Nitrogen Reference Point if it is as benchmark, grandparenting of N or to allocate N. FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters
Cameron, Bruce Submitter ID: 60603	PC1-12725	Policy 2	RETAIN Policy 2 AND RETAIN appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.	Support in part	FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.
Cameron, Bruce Submitter ID: 60603	PC1-6225	Policy 2	RETAIN Policy 2. AND AMEND PPC1 to reflect Policy 1 in adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.	Support in part	FFNZ supports an approach that targets contaminants at a sub-catchment level and is tailored to fit each sub-catchment characteristic.
Charion Investment Trust Submitter ID: 71344	PC1-7685	Policy 2	REPLACE Policy 2 (d) with: " <u>...d. Requiring Farm Environment Plans to identify the areas and activities representing diffuse discharge risks and the most effective way of managing those risks on the particular property.</u> "	Oppose in part	FFNZ considers that the discharge must be proportionate to the amount of the discharge, the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy and values and the particular sub-catchment characteristics.
Charion Investment Trust Submitter ID: 71344	PC1-12730	Policy 2	AMEND Policy 2 and all associated Rules as required to incorporate the intent of Policy 9 .	Support in part	FFNZ supports sub-catchment planning and whole of community actions to improve water quality as is the intent of Policy 9. However the submitter did not provide particulars on the relief it seeks and accordingly FFNZ is at this stage is not in a position to support the amendments.
CNI Iwi Land Management Limited	PC1-10777	Policy 2	AMEND Policy 2 (c): "Establishing a Nitrogen Reference Point for the property or enterprise for the sole	Oppose in part	FFNZ considers that Nitrogen Reference Point can be used to indicate where farmers are at presently and as a trigger point for decisions on N

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 74026			<u>purpose of establishing an ability to reduce nitrogen loss; and</u> " Or words to like effect.		increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters. FFNZ opposes Nitrogen Reference Point if it is as benchmark, grandparenting of N or to allocate N.
DairyNZ Submitter ID: 74050	PC1-10198	Policy 2	AMEND Policy 2 (d) to read: "d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount risk of current discharge <u>leaving a property from overland flow or leaching below the root zone, as identified in farm environment plans entering waterbodies</u> (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment <u>plan</u> ; and..."	Support in part	FFNZ agrees that the discharge must be proportionate to the amount of the current discharge, and the particular sub-catchment characteristics but states it also has to be proportionate to the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy.
DairyNZ Submitter ID: 74050	PC1-12741	Policy 2	RETAIN the first sentence of Policy 2 and clause (b) and (c). AND AMEND Policy 2 (a) to read: "a. Taking a tailored, risk based approach to define mitigation actions on the land that will reduce for diffuse discharges of nitrogen..." AND ADD a NEW clause (e) to read: " <u>Where sub-catchment plans do not exist, individual Farm Environment Plans shall ensure that that the risk of diffuse phosphorus, nitrogen, sediment, and microbial pathogens entering waterbodies is identified by suitably qualified and experienced people, and time-bound and monitored actions are</u>	Support in part	FFNZ supports retaining the first sentence of Policy 2 and clause (b) and (c) as well as recognising that reductions may not always be required. FFNZ oppose new clause (e) in part simply because FFNZ's MPA framework in submission on Variation 1 has a broader use and approach for FEPs. In FFNZ's submission on Variation 1 it seeks new policies 2A and 2B that give direction and guidance on FEPs and sets the objectives and intended contexts of a FEP. FFNZ supports the submitter in as far as the submission point does not undermine the MPA framework in its submissions.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>put in place to address risks of phosphorus, sediment and microbial contaminants. For diffuse nitrogen discharges, Farm Environment Plans will:</u> i. <u>ensure that nitrogen losses stay within a five year rolling average, and</u> ii. <u>for farms above the 75th percentile value, nitrogen losses decrease to that value, and</u> iii. <u>for all other farms, nitrogen losses do not exceed the Nitrogen Reference Point."</u>		
Department of Conservation Submitter ID: 71759	PC1-10646	Policy 2	AMEND Policy 2 to provide clearer direction to landowners and PPC1 users by amending Policy 2 to read: "Manage and require reductions in <u>Reduce</u> sub-catchment wide diffuse discharges..."	Oppose	Reductions may not always be required.
Farm Environment Trust (Waikato) Submitter ID: 73798	PC1-5058	Policy 2	Policy 2: CLARIFY as to how the Farm Environment Plans link to targets that are set in Table 3.11-1 AND AMEND after considering if Farm Environment Plans may be at odds to the objective of no net increase in contaminants at the catchment level.	Support in part	FFNZ in its submission to Variation 1 seeks amendments to Policy 2d) that links with the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy. The submitter did not state particulars to the second part of the submission point or the relief it seeks. Accordingly FFNZ is not in a position to support the relief sought by the submitter.
Farm Environment Trust (Waikato) Submitter ID: 73798	PC1-12752	Policy 2	ADD to PPC1 a clearly outlined compliance policy.	Oppose	The submitter did not give particulars or explanation of this submission point nor did the submitter provide details of the relief it seeks. Accordingly FFNZ opposes the relief sought by the submitter.
Farm Environment Trust (Waikato)	PC1-12753	Policy 2	Policy 2: AMEND to consider the limitations of the OVERSEER Model when setting fixed reference points in	Support in part	FFNZ supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73798			catchments where nitrogen is not the issue.		provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.
FarmRight Submitter ID: 73720	PC1-5386	Policy 2	RETAIN the wording of Policy 2 as notified AND AMEND related Rules to address issues identified in this submission.	Oppose in part	FFNZ supports a tailored and risk based approach to managing diffuse discharges on a sub-catchment basis as set out in Policy 2. However, it considers that Policy 2 requires amendments to provide appropriate parameters around or a framework for assessing required actions as set out in FFNZ's submission on Variation 1.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9712	Policy 2	AMEND Policy 2 to read: "Manage and require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to water</u> from farming activities on properties and enterprises <u>and where the sub-catchment is over-allocated require reductions in these losses</u> by: a. Taking a tailored, risk based approach to define mitigation actions on the land that will reduce-control diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to water</u> , with the mitigation actions to be specified in a Farm Environment Plan either associated with a resource consent, or in specific requirements established by participation in a Certified Industry Scheme; and ... d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to water</u> to be proportionate to	Support in part	FFNZ agrees that reductions in discharges may not always be required. As to policy 2d) FFNZ supports FEP based on critical source areas and identification of appropriate mitigations through the Most Practical Action framework proposed in FFNZ's submission on Variation 1. As to policy 2e) FFNZ supports reference to Schedule C to reflect its approach of placing minimum standards in Schedule C and requiring all farms to comply with those minimum standards (subject to an FEP assessment which could identify more stringent or different mitigations than the minimum standards).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			the amount of current <u>diffuse discharge to water</u> , (those <u>losing discharging</u> more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment <u>with reductions guided by mitigations set out in specified a Farm Environment Plan and through implementation of Good Management Practice</u> ; and e. Requiring stock exclusion from <u>water bodies, as identified in the Schedules to this Plan</u> , to be completed within 3 years following the dates ..."		
Fletcher Trust Submitter ID: 73848	PC1-5894	Policy 2	AMEND Policy 2(d) AND REPLACE with the following: " <u>Requiring Farm Environment Plans to identify the areas and activities representing diffuse discharge risks and the most effective way of managing those risks on the particular property.</u> "	Oppose	FFNZ considers that the discharge must be proportionate to the amount of the discharge, the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy and values and the particular sub-catchment characteristics.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10470	Policy 2	AMEND Policy 2 part a.to read: "...a. Taking a tailored, risk based approach: <u>i. To define mitigation actions on the land that will reduce diffuse discharges of nitrogen, phosphorus...</u> <u>ii. To manage the diffuse discharge of nitrogen to:</u> <ul style="list-style-type: none"> • <u>Ensure discharges do not exceed the Nitrogen Reference Point for the property of enterprise; and</u> 	Support in part	FFNZ supports the use of the NRP solely as a reference point but not if it is used as benchmark, grandparenting of N or to allocate N. FFNZ considers that it should be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters. FFNZ agrees with an approach that requires the 75 th percentile to reduce.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<ul style="list-style-type: none"> <u>Avoid management practices that would result in significant inefficiency of nitrogen use; and</u> <p><u>Reduce on any property or enterprise whose Nitrogen Reference Point is above the 75th percentile nitrogen leaching value so that the discharge is less than or equal to the discharge of the 75th percentile nitrogen leaching value with the maximum three year rolling average to be specified in a resource consent or Farm Environment Plan...</u></p>		
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-12759	Policy 2	REPLACE Policy 2 part d to read: " <u>...d. Requiring Farm Environment Plans to identify the areas and activities representing diffuse discharge risks and the most effective way of managing those risks on the property or enterprise....</u> "	Oppose in part	FFNZ considers Policy 2d) should be proportionate in the context of several factors when reducing discharges. This is needed both to achieve the environmental outcomes and to achieve them at lowest social and economic cost. FFNZ considers that the discharge must be proportionate to the amount of the discharge, the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy and values and the particular sub-catchment characteristics.
Fonterra Shareholders Council Submitter ID: 72610	PC1-10636	Policy 2	AMEND Part A of Policy 2 to reflect a differentiation between the way Nitrogen and the other three contaminants, phosphorus, sediment and E.coli are managed.	Oppose	<p>In principle FFNZ does not have a problem with differentiating Nitrogen and other contaminants but after reading the next one FFNZ opposes the submission point.</p> <p>FFNZ supports the use of the NRP provided it is used as a reference point only but not if it is used as benchmark, grandparenting of N or to allocate N. FFNZ supports Overseer as a on farm decision support tool ONLY and considers it is appropriate for calculating the NRP provided that</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance. FFNZ considers that the appropriate course of action for managing discharges including Nitrogen is by adopting Most Practicable Actionss for diffuse discharge and Best Practicable Options for point source discharge. Overseer and the NRP is tools to inform on possible mitigation actions and options.
Fonterra Shareholders Council Submitter ID: 72610	PC1-12760	Policy 2	AMEND Policy 2 to ensure that Nitrogen be managed using the OVERSEER Model and the other three contaminants should be managed via the Farm Environment Plan.	Support in part	FFNZ oppose the use of the NRP if it is used as benchmark, grandparenting of N or to allocate N. FFNZ also supports Overseer as an on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). FFNZ considers that the appropriate course of action for managing discharges including Nitrogen is by adopting Most Practicable Actionss for diffuse discharge and Best Practicable Options for point source discharge. Overseer and the NRP is tools to inform on possible mitigation actions and options.
Gaudin, Philip and Pauline Submitter ID: 72820	PC1-12762	Policy 2	AND AMEND to provide for stock exclusion slope requirements to be no greater than 15 degrees as per the Clean Water Report (February 2017) AND AMEND the exclusion requirements for cattle on land between 3 and 15	Oppose in part	FFNZ considers that provisions about stock exclusion should be affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that:

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			degrees slope to only apply to all permanently flowing waterways greater than 1m wide AND AMEND to ensure Waikato Regional Council and central government continue to subsidise any waterway fencing AND AMEND to ensure that actively managing stock across waterways be allowed but limited.		<ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue. <p>FFNZ would support an approach that considers the use of incentives and other public funds to provide compensation where there is a public good.</p>
Gleeson, Graeme B Submitter ID: 73800	PC1-12767	Policy 2	DELETE Policy 2 requirements to manage farming activities to a historic Nitrogen Reference Point AND REPLACE with live weight standards linked to the natural capital of soils, climate and assimilative capacity of water OR allocate nitrogen as it is tied to the natural capital of soils. AND DELETE 75th percentile nitrogen leaching value AND REPLACE with requirements and standards that ensure the reductions required in over-allocated catchments, and where nitrogen is an issue, are proportionate to the level of improvement required and the impact of the discharge. Highest dischargers should be targeted first and consideration should be given to the economic implications of reducing and the timeframe for making reductions.	Support in part Oppose in part	<p>FFNZ's position is that NRP should not be used as benchmark, grandparenting of N or to allocate N. FFNZ considers that it can be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.</p> <p>FFNZ opposes live weight standards and allocation of nitrogen based on natural capital of soils. Amongst other reasons, land use classification based on soil was not designed for measuring contaminant leaching and as a result the relationship between land use and contaminants are unreliable. The amount of Nitrogen leached from land is due to a wide range of factors many which does not form part of land use classification.</p> <p>FFNZ opposes the submission on the 75th percentile and replacement provisions as FFNZ</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND the rules to ensure low contaminant loss land uses are a permitted activity.</p> <p>AND AMEND to ensure that high nitrogen dischargers, except horticulture, are required to reduce over time, starting immediately, and achieving 10% reductions every year for the life of PPC1.</p> <p>AND AMEND to ensure horticultural nitrogen losses are managed in a manner that recognises the value of the industry to the community.</p>		<p>supports provisions that require those who discharge above 75th percentile to reduce to the 75th percentile as part of its framework as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that issues arising from the over-allocation of nutrients or contaminants can generally be addressed in ways other than allocation, such as the implementation of good management practices (and MPA)</p> <p>FFNZ agrees that the value of horticulture to the community ought to be recognised but that the same applies to all activities.</p>
<p>Gleeson, Graeme B Submitter ID: 73800</p>	<p>PC1-12768</p>	<p>Policy 2</p>	<p>WITHDRAW PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment</p> <p>AND ADOPT a sub-catchment approach to focus on contaminants important to each farm and sub-catchment</p> <p>AND ENSURE greater understanding about spatial location of natural resources is developed so this knowledge can be applied to better inform and manage contaminant loss</p> <p>AND AMEND or ADD new rules that are based on land class and pasture production capability, where land use is supported by the capability of the land giving rise to contaminant loss no greater than acceptable ecosystem health limits.</p> <p>OR ADOPT equal nitrogen allocation flexibility for all land users (at 20kgN/ha) as a permitted activity.</p>	<p>Oppose in part</p> <p>Support in part</p>	<p>FFNZ supports measures to close the currently gaps in understanding and knowledge to better manage contaminant loss. This is one of the reasons why FFNZ does not support the 80 years numeric targets and considers as knowledge and information becomes available better and more accurate targets can be progressively set to reach long term aims.</p> <p>FFNZ opposes new rules that allocates contaminants based on land class and pasture production capability. Amongst other reasons, land use classification was not designed for measuring contaminant leaching and as a result the relationship between land use and contaminants are unreliable. For instance the amount of Nitrogen leached from land is due to a wide range of factors which does not form part of land use classification.</p> <p>FFNZ considers that a "permitted baseline" ought to be provided, either 15kgN (with farming</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					activities able to increase up to it) or some other reasonable measure). FFNZ would support that baseline being 20kgN if it was supported by the science
Gleeson, Graeme B Submitter ID: 73800	PC1-6409	Policy 2	<p>AMEND Schedule 1 to ensure that Farm Environment Plans are as uncomplicated as possible, including plans that are hand-written.</p> <p>AND AMEND to ensure supporting documents outlining Good Management Practices, as recognised by industry, are readily available to all land users.</p> <p>AND AMEND to ensure that Farm Environment Plans include who will be responsible for and when and how mitigation will occur. The financial position of a farm as a means of justifying the amount of mitigation undertaken by a farm should not be required.</p> <p>AND AMEND the rules so that farms with a low risk of contaminant loss are enabled to operate for the next 10 years as a permitted activity, subject to conditions relating to stocking rate and the preparation of a Beef and Lamb New Zealand Land and Environment Plan Level 1 and 2 or equivalent, and adopting industry-supported Good Management Practice.</p> <p>AND AMEND to ensure that low risk land users are able to continue as a permitted activity without the need to prepare a Farm Environment Plan.</p> <p>AND AMEND Rule 3.11.5.3 to be a Permitted Activity where a Farm Environment Plan is provided and</p>	Support in part and oppose in part	<p>FFNZ supports a pragmatic approach to FEPs.</p> <p>FFNZ supports dissemination of industry agreed GMP.</p> <p>FFNZ considers that sufficient flexibility ought to be provided in FEPs to recognise the particular farm enterprise and to respond to changing circumstances e.g. climatic events. Therefore, while it may be appropriate in some cases to state the person responsible and when the mitigation will occur FFNZ considers that flexibility ought to be provided and this should not be compulsory.</p> <p>FFNZ agrees that the resources reasonably available to the farm enterprise as well as the significance of any proposed investment in the property and in mitigations ought to be taken into account in FEPs.</p> <p>FFNZ supports providing the flexibility for low risk properties but does not support limiting this to stocking rates or other similar input controls.</p> <p>FFNZ considers that all farm enterprises over a certain size ought to prepare an FEP but that a simplified FEP ought to be provided for low nitrogen properties (or properties below a permitted baseline as set out in FFNZ's submission on Variation 1).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			REMOVE the requirement to be under a Certified Industry Scheme. AND AMEND to extend the timeframes required for Farm Environment Plans. AND AMEND to ensure that Farm Environment Plans adopt a tailored individual approach. AND ENSURE Farm Environment Plans assess appropriate land use options for each farm, and encourage better science to determine which contaminants are of concern for each farm and sub-catchment.		FFNZ considers that there should be the option for farmers to choose to be part of a CIS or to obtain a controlled activity consent from Council or to be permitted if they meet the required standards (FFNZ refers further to its submission on Variation 1). FFNZ agrees that the timeframes in PC1 ought to be amended to reflect the two year delay since notification of PC1. FFNZ supports a tailored and proportionate FEP approach as opposed to a one size fits all or blanket approach or focusing on one contaminant.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5387	Policy 2	AMEND Policy 2 by either replacing OR supplementing the tailored approach with Best Practicable Options for all land use activities, to be adopted within workable but prompt time frames.	Support in part	FFNZ considers that the Most Practicable Action framework is the appropriate framework for assessing mitigations and actions for managing diffuse discharges. FFNZ considers that paragraph a in policy 2 needs to refer to MPAs to provide the framework of the tailored, risk based approach. FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-12780	Policy 2	DELETE Policy 2(c).	Oppose in part	FFNZ supports the Nitrogen Reference Point if it is used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters. FFNZ opposes it if it is used as benchmark, for grandparenting of N or to allocate N.

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Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-12781	Policy 2	RETAIN Policy 2(d).	Support in part	FFNZ supports a tailored and risk based approach to managing diffuse discharges on a sub-catchment basis as set out in Policy 2. However, it considers that Policy 2 requires amendments to provide appropriate parameters around or a framework for assessing required actions as set out in FFNZ's submission on Variation 1.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-12782	Policy 2	AMEND Policy 2 (e) as required to reflect realistic time frames for extensive drystock farms.	Support	FFNZ shares the submitters concerns with the time frames proposed.
Hill Country Farmers Group Submitter ID: 73321	PC1-7719	Policy 2	AMEND Policy 2 so that new technologies can be included into the mitigation toolbox without plan amendments.	Support	FFNZ's submission on Variation 1 seeks that FEPs are prepared by certified farm environment planners and if prepared in accordance with Schedule 1 then Council does not have control over the content of FEPs. This provides flexibility and the ability to change actions in response to changes like new technologies.
Hill Country Farmers Group Submitter ID: 73321	PC1-12789	Policy 2	AMEND Policy 2 to read: "Tailored approach to <u>managing and where relevant</u> reducing diffuse discharges from farming activities...Manage and <u>where relevant</u> require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming activities on properties and enterprises by:... d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>where required</u> to be proportionate to the amount of current discharge (those discharging more are	Support	FFNZ considers that there may be times where maintaining water quality is the appropriate metric and also agrees that discharges only needs to reduce when relevant. FFNZ supports an amendment to Policy 2 that records "where relevant" . FFNZ opposes the Nitrogen Reference Point if it is used as benchmark, for grandparenting of N or to allocate N. FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and</p> <p>e. Requiring stock exclusion <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u> to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026."</p> <p>AND AMEND to require reduction in contaminants where attribute targets are breached and maintain in other sub-catchments.</p>		<p>FFNZ supports the additional phrase "where required" for the same reasons as "where relevant".</p> <p>FFNZ considers that provisions about stock exclusion should be affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope and has concerns with the completion dates. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that:</p> <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue
Hill Country Farmers Group Submitter ID: 73321	PC1-12790	Policy 2	Policy 2 - AMEND the stock exclusion fencing requirement to align with proposed amendments to NPS-FM.	Oppose in part	FFNZ agrees that the stock exclusion requirements need to be amended but considers that they ought to be aligned with a stocking rate (to reflect intensity) and accord water bodies as set out in FFNZ's submission on Variation 1.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10051	Policy 2	<p>AMEND Policy 2 to read:</p> <p>"Manage and require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming activities on properties and enterprises by:</p> <p>a. Taking a tailored, risk based approach to define mitigation actions on the land that will reduce diffuse discharges of nitrogen, phosphorus, sediment and</p>	Oppose in part	FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate and/or allocated contaminants (FFNZ does not support allocation). FFNZ is also concerned about the potential power to catchment collective, potential for abuse of that power and potential significant cost.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>microbial pathogens, with the mitigation actions to be specified in a Farm <u>or Enterprise</u> Environment Plan either associated with a resource consent, or in specific requirements established by participation in a Certified Industry Scheme; and</p> <p>b. Requiring the same level of rigour in developing, monitoring and auditing of mitigation actions on the land that is set out in a Farm <u>or Enterprise</u> Environment Plan, whether it is established with a resource consent or through Certified Industry Schemes; and</p> <p>c. Establishing a Nitrogen Reference Point <u>or proxy for the a</u> property or enterprise that is <u>not part of a consented catchment collective managing a range of properties as a single group</u>; and</p> <p>d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions) <u>when assessed across all 4 contaminants, and proportionate to the scale tailored to ensure reductions are targeted at actions within the sub-catchments that will improve the values of freshwater specified within this plan.</u> Of improving values water quality improvements required in the sub-catchment; and</p> <p>e. Requiring stock exclusion to be completed within 3 years following the</p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026."		
Matamata-Piako District Council Submitter ID: 73419	PC1-12830	Policy 2	AMEND Policy 2 'e.' to read: "e. Requiring stock exclusion to be completed within <u>the timeframes set out in a Farm Environment Plan.</u> "	Support	The Submitter's relief for policy 2 addresses FFNZ concerns with the time frames for stock exclusions as proposed in Policy 2.
Mercury NZ Limited Submitter ID: 73182	PC1-9517	Policy 2	AMEND Policy 2 (a and b) to read: "a. established by participation in a Certified Industry Sector Scheme; and b.....established with a resource consent or through a Certified Industry Sector Schemes; and..." DELETE from PPC1 the term Certified Industry Scheme AND REPLACE with Certified Sector Scheme.	Support in part	FFNZ agrees that the word 'sector' better describes what is intended than the word 'industry'. WFFNZ supports the clarifying amendments to the name of the Scheme.
Mercury NZ Limited Submitter ID: 73182	PC1-12838	Policy 2	AMEND Policy 2 (e) to read: "e. Requiring stock exclusion <u>from rivers, streams, drains, wetlands and lakes</u> to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026."	Oppose in part	Requiring all stock to be excluded form all water bodies will impose significant cost for no net benefit. Accordingly FFNZ considers a better approach is based on accord water bodies or something similar.
Miraka Limited Submitter ID: 73492	PC1-8811	Policy 2	AMEND Policy 2(b) to extend the parity of rigour of Farm Environment Plans to all farming sectors.	Oppose in part	FFNZ considers that all farm enterprises over a certain size ought to prepare an FEP but that a simplified FEP ought to be provided for low nitrogen properties (or properties below a permitted baseline as set out in FFNZ's submission on Variation 1).
Miraka Limited Submitter ID: 73492	PC1-12840	Policy 2	AMEND Policy 2(d) to read as follows: "Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the <u>amount of current discharge difference</u>	Support in part	FFNZ considers there is merit in focussing on those activities where practicable mitigations actions are not currently being applied. However FFNZ considers Best Management Practices is too stringent a term and would prefer use of the term Most Practicable Actions. Also FFNZ does

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>between current practices and the application of Best Management Practices</u> (those discharging more <u>are currently not applying mitigations</u> expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and"		not support deleting taking into account the amount of current discharge when considering reductions. FFNZ considers that the discharge must be proportionate to the amount of the discharge, the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy and values and the particular sub-catchment characteristics.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4611	Policy 2	RETAIN Policy 2.	Support in part	FFNZ supports a tailored and risk based approach to managing diffuse discharges on a sub-catchment basis as set out in Policy 2. However, it considers that Policy 2 requires amendments to provide appropriate parameters around or a framework for assessing required actions as set out in FFNZ's submission on Variation 1.
O.M and P.R Houchen Ltd Submitter ID: 71655	PC1-7832	Policy 2	AMEND PPC1 so it includes provisions to discourage water from draining into the hills which will slow the water down in the swamps and filter out the nutrients and in combination with a troughing system should control the problem. AND AMEND PPC1 so planting of deciduous trees is encouraged as grass can grow down to the tree roots with troughs being places close to the shade on firm dry land.	Support in part	FFNZ supports taking sensible and practical steps to mitigate effects of discharge on water quality.. FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-12859	Policy 2	AMEND Policy 2 by redrafting to reflect the alternative approach proposed in this submission [overview of the alternative approach in Table 2 of submission], including by deleting reference to the requirement for a Nitrogen Reference Point and incorporating a reference to the requirement for new farming activities to	Oppose in part	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter in its alternative approach because it is effectively based on input controls and is likely to be inflexible, impractical

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			adopt the Best Practicable Options. IF this relief in not accepted then AMEND to as a minimum achievement of diffuse discharges from farming activities and commercial vegetation through the adoption of Best Practicable Options in accordance with Policy 3 d) [as redrafted the submission].		<p>cause significant cost, not address water quality etc. For avoidance of doubt FFNZ also opposes the next alternative (adoption of BPOs in accordance with the submitter's amended Policy 3d)..</p> <p>Unlike the submitter, FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p>
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6397	Policy 2	AMEND Policy 2 by replacing " management and require reductions " of diffuse discharges with " <u>achieve reductions</u> ".	Oppose	FFNZ opposes the amendments that seeks only achieving reductions as it would change policy 1 to requiring blanket reduction of all contaminants whether or not the attributes and values are already achieved in a subcatchment and without consideration for other relevant factors. The Values and Vision & Strategy are not simply about reducing contaminants e.g. wetlands, offsets, edge of field mitigations etc
Primary Land Users Group Submitter ID: 71427	PC1-11144	Policy 2	AMEND Policy 2 to read: "Policy 2: Tailored approach to " <u>managing and where relevant</u> " reducing diffuse discharges from farming activities... Manage and " <u>where relevant</u> " require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from	Support	FFNZ considers that there may be times where maintaining water quality is the appropriate metric and supports that discharges only needs to reduce when relevant. FFNZ supports an amendment to Policy 2 that records the above .

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			farming activities on properties and enterprises by: ...d. Requiring a degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens " <u>where required</u> " to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and"		
Primary Land Users Group Submitter ID: 71427	PC1-12876	Policy 2	AMEND Policy 2 to read: "e. Requiring stock exclusion " <u>for areas with a slope of less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u> " to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026"	Oppose	FFNZ considers that provisions about stock exclusion should be affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that: <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue.
Primary Land Users Group Submitter ID: 71427	PC1-12877	Policy 2	AMEND Policy 2 to align with the proposed amendments to the National Policy Statement for Freshwater Management.	Oppose in part	In principle FFNZ agrees that NPS-FM should be given effect to. However the submitter did not provide particulars of the relief it seeks. FFNZ cannot support the submission point until it sees the proposed relief.
Pukekohe Vegetable Growers Association Inc (PVGA)	PC1-7779	Policy 2	RETAIN the Policy 2 reference to Farm Environment Plans.	Support	FFNZ supports an approach based on considering sub-catchment characteristics and tailored and proportionate actions in FEPs.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 74220					
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-12878	Policy 2	REMOVE the Nitrogen Reference Point from Policy 2 and PPC1 AND AMEND by recognising the limitations of the OVERSEER Model as a regulatory tool.	Oppose	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).
Raukawa Charitable Trust Submitter ID: 74073	PC1-10551	Policy 2	RETAIN Policy 2.	Oppose in part	FFNZ supports a tailored and risk based approach to managing diffuse discharges on a sub-catchment basis as set out in Policy 2. However, it considers that Policy 2 requires amendments to provide appropriate parameters around or a framework for assessing required actions as set out in FFNZ's submission on Variation 1.
Ravensdown Limited Submitter ID: 74058	PC1-10102	Policy 2	AMEND Policy 2 to retain the overall intent but reword and clarify to read: "a. Taking a tailored, risk based approach to Define mitigation actions... b. Requiring the same level of rigour in developing, monitoring and auditing of mitigation actions on the land that is set out in a Farm Environment Plan, whether it is established with a resource consent or through Certified Industry Schemes; and c. b. Establishing a Nitrogen Reference Point for the property or enterprise <u>in accordance with Schedule B; and</u>	Oppose in part	FFNZ consider that the identification of appropriate mitigations should be done through the Most Practicable actions (MPA) framework proposed in FFNZ's submission on Variation 1. FFNZ considers that the MPA framework is the appropriate framework for assessing mitigations and actions for managing diffuse discharges. FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>d. c. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and</p> <p>AND ADD a new clause d.: <u>"d. Require farming activities to adopt Good Management Practices; and"</u></p>		<p>consent. The balance is ensuring that CIS is done properly and accordingly FFNZ oppose the deletion of Policy 2b.</p> <p>FFNZ opposes Nitrogen Reference Point if it is as benchmark, grandparenting of N or to allocate N.</p> <p>FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.</p> <p>FFNZ considers Policy 2d) (submitters 2c) should be proportionate in the context of several factors when reducing discharges not just the scale of improvement required in the sub-catchment. This is needed both to achieve the environmental outcomes and to achieve them at lowest social and economic cost.</p> <p>FFNZ considers that the discharge must be proportionate to the amount of the discharge, the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy and values and the particular sub-catchment characteristics.</p> <p>FFNZ supports the implementation of good management practices through the MPA framework set out in FFNZ's submission to Variation 1.</p>
Rotorua Lakes Council	PC1-2503	Policy 2	AMEND Policy 2 (c) to read: <u>"Establishment of a Nitrogen Reference Point for the property or enterprise based</u>	Oppose	FFNZ opposes the use of LUC/natural capital as mechanism or method establish a Nitrogen Reference Point. Amongst other reasons, LUC

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73373			<u>on the natural ability of the land to limit leaching of contaminants, which is inter alia imparted by the land's Land Use Capability class.</u> AND MAKE any consequential amendments.		was not designed for Nitrogen leaching and as a result the relationship between LUC and nitrogen is unreliable. The amount of Nitrogen leached from land is due to a wide range of factors which does not form part of LUC.
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5645	Policy 2	Policy 2 - DELETE the use of industry self-management schemes AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives AND research a series of mitigations with strong data to support their efficacy and help introduce them. These will in combination with pollution levies have the greatest and fastest effect on water pollution AND DELETE the use of a proportional system in PPC1 and REPLACE with pollution levies.	Oppose in part	FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. FFNZ supports the implementation of good management practices (best is too stringent and subjective) through the MPA framework set out in FFNZ's submission to Variation 1. FFNZ oppose the use of pollution levies and considers Policy 2d) should be proportionate in the context of several factors when reducing discharges. This is needed both to achieve the environmental outcomes and to achieve them at lowest social and economic cost.
Save Lake Karapiro Inc Submitter ID: 72459	PC1-12904	Policy 2	Policy 2- REMOVE the use of the OVERSEER Model from PPC1 and do not use it for any mitigation practice. AND REMOVE the use of Overseer or any other measuring tool in PPC1 until it is accurate both relatively and absolutely. AND DELETE the use of benchmarking or allocation. AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves.	Oppose in part	FFNZ considers the use of Overseer is appropriate as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). FFNZ opposes Nitrogen Reference Point if it is used as benchmark, grandparenting of N or to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					allocate N. FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11099	Policy 2	AMEND Clause d) of Policy 2(d) to read: "d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchments <u>which is capable of being achieved in the short-term taking into account the particular characteristics of each sub-catchment;...</u> " ADD a NEW clause that reads: " <u>da. Providing for and allowing opportunity for offset mitigation between properties or enterprises which will achieve the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens proportionate to the amount of current discharge and proportionate to the scale of water quality improvement required in the sub-catchments capable of being achieved in the period to 2026, taking into account the particular characteristics of each sub-catchment.</u> "	Support in part	FFNZ considers Policy 2d) should be proportionate in the context of several factors when reducing discharges including those proposed by the submitter namely contribution towards the short term targets and the particular sub-catchment characteristics. In principle FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1). However, it considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).
South Waikato District Council	PC1-4039	Policy 2	AMEND Policy 2(c) to read: "c. Establishing a Nitrogen Reference Point for a property or enterprise <u>based</u>	Oppose in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 72892			<u>on using industry or sector group accepted models or similar...</u> "		Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number.
South Waikato District Council Submitter ID: 72892	PC1-12922	Policy 2	AMEND Policy 2(e) to read: "e. Requiring stock exclusion to be completed within 3 years following the dates by which the timeframes set out in a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026. "	Support	The Submitter's relief for policy 2 addresses FFNZ concerns with the time frames for stock exclusions as proposed in Policy 2.
Spectrum Dairies Limited Partnership Submitter ID: 73958	PC1-2752	Policy 2	Policy 2: AMEND PPC1 to provide greater clarity for farms and more objectivity regarding land use change AND AMEND Policy 2 to reconsider the economic outfall and value loss from people leaving farming AND AMEND to include logical solutions that have positive economic and environmental effects AND undertake wider consultation, on a farm by farm basis.	Support	FFNZ agrees that flexibility for land use change needs to be provided. The submitter's concerns appear to be that the effects on economic and community wellbeing has not been appropriately considered when setting the numeric attribute states. If this is correct, FFNZ shares these concerns.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9352	Policy 2	DELETE from Policy 2 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments.	Oppose in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-12932	Policy 2	Policy 2 - develop a measurement system that targets E.coli and phosphorous as a precursor for the whole Farm Environment Plan.	Support in part	FFNZ seeks an approach that is consistent across all contaminants and not just focussing on N. FFNZ proposes that activities have to address contaminants that are an issue for the sub-catchment in proportion to their contribution towards the issue.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-12933	Policy 2	Policy 2 - develop a stock exclusion measure that takes into account the length of waterway excluded, and/or the amount of fencing, and/or the area of planting, and /or the edge of field improvements and stock intensity AND AMEND so that once the stock exclusion and edge of field improvements are achieved an Overseer based program could be considered AND MAKE any other consequential amendments.	Oppose in part	FFNZ considers that provisions about stock exclusion should be affordable, practical and sustainable. We consider that is the intent of the submission point. However FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that: <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11779	Policy 2	RETAIN Policy 2.	Oppose in part	FFNZ supports a tailored and risk based approach to managing diffuse discharges on a sub-catchment basis as set out in Policy 2. However, it considers that Policy 2 requires amendments to provide appropriate parameters around or a framework for assessing required actions as set out in FFNZ's submission on Variation 1.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	PC1-8252	Policy 2	AMEND Policy 2 to read as follows: "Policy 2: Tailored approach to Reducing diffuse discharges from farming activities. Manage and require reductions in sub-catchment wide diffuse discharges of	Oppose in part	FFNZ considers reduction of discharges will not always be required. FFNZ supports a tailored and risk based approach to managing diffuse discharges.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 74122			<p>nitrogen, phosphorus, sediment and microbial pathogens from farming activities on properties and enterprises by:</p> <p>a. Taking a tailored, risk-based approach to define mitigation actions on the land that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a Farm Environment Plan either associated with a resource consent, or in specific requirements established by participation in a Certified Industry Scheme <u>Requiring the 75th percentile of dairy farms to reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to below the 75th percentile level by 2026;</u></p> <p>b. Requiring the same level of rigour in developing, monitoring and auditing of mitigation actions on the land that is set out in a Farm Environment Plan, whether it is established with a resource consent or through Certified Industry Schemes <u>requiring all farming activities to operate using good management practice by 2019;</u></p> <p>c. <u>where further reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens are necessary, these are to be achieved by the use of best management practices;</u></p> <p>d. <u>where further reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens are</u></p>		<p>FFNZ opposes the submitter's proposed relief for 2a. FFNZ supports a tailored and risk based approach to managing diffuse discharges on a sub-catchment basis. Although FFNZ supports provisions that require those who discharge above 75th percentile to reduce to the 75th percentile it does not agree with the submitters time frame or that it should be part of policy 2. The reduction should be provided for as part of its framework as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ opposes the submitter's proposed relief for 2b. FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Having said that it then requires provision that CIS is done properly and accordingly FFNZ oppose the deletion of Policy 2b. FFNZ supports the implementation of good management practices but through the MPA framework set out in FFNZ's submission to Variation 1 and not within the unsuitable time frame proposed by the submitter.</p> <p>FFNZ opposes the submitter's proposed relief for 2c. FFNZ supports the implementation of good management practices but through the MPA framework set out in FFNZ's submission to Variation 1. FFNZ consider best management practices are too stringent.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>necessary, these are:</u> <u>(i) proportionate to the amount of current discharge for the activity operating at best management practices (those discharging more are expected to make greater reductions); and</u> <u>(ii) proportionate to the scale of water quality improvement required in the sub-catchment;</u> <u>d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and</u> <u>e. mitigation actions required to meet the reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens needed to achieve the losses under Policy 2(b) are specified in a Farm Environment Plan;</u> <u>ef. establishing a Nitrogen Reference Point for the property or enterprise; and</u> <u>eg. requiring stock exclusion to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026."</u></p>		<p>FFNZ opposes the submitter's proposed relief for 2d in part. FFNZ considers that the discharge must be proportionate to the amount of the current discharge (not a hypothetical position as if best management practices have been applied), although it supports that the particular sub-catchment characteristics be part of the context of factors to determine proportion of reduction.</p> <p>FFNZ supports tailored FEPs based on identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1 which includes giving the FEPs flexibility to change.</p>
Tierney, Colm and Gaynor Submitter ID: 73091	PC1-12942	Policy 2	<p>DELETE Policy 2(d) and replace it with the decision sought in the DairyNZ submission. [RETAIN the first sentence of Policy 2 and clause (b) and (c).</p>	Support in part	See FFNZ's further submissions to DairyNZ submission on policy 2.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND Policy 2 (a) and (d) to read: "a. Taking a tailored, risk based approach to define mitigation actions on the land that will reduce <u>for</u> diffuse discharges of nitrogen...</p> <p>d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount <u>risk</u> of current discharge <u>leaving a property from overland flow or leaching below the root zone, as identified in farm environment plans entering waterbodies</u> (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment <u>plan</u>; and..."</p> <p>AND ADD a NEW clause (e) to read: <u>"Where sub-catchment plans do not exist, individual Farm Environment Plans shall ensure that that the risk of diffuse phosphorus, nitrogen, sediment, and microbial pathogens entering waterbodies is identified by suitably qualified and experienced people, and time-bound and monitored actions are put in place to address risks of phosphorus, sediment and microbial contaminants. For diffuse nitrogen discharges, Farm Environment Plans will:</u> i. <u>ensure that nitrogen losses stay within a five year rolling average, and</u> ii. <u>for farms above the 75th percentile value, nitrogen losses decrease to that value, and</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>iii. for all other farms, nitrogen losses do not exceed the Nitrogen Reference Point."]</u>		
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10273	Policy 2	RETAIN Policy 2.	Oppose in part	FFNZ supports a tailored and risk based approach to managing diffuse discharges on a sub-catchment basis as set out in Policy 2. However, it considers that Policy 2 requires amendments to provide appropriate parameters around or a framework for assessing required actions as set out in FFNZ's submission on Variation 1.
Waikato and Waipa Branches of the New Zealand Deer Farmers Association Submitter ID: 74008	PC1-9490	Policy 2	AMEND Policy 2(e) to read: "e. Requiring stock exclusion to be completed within 3 years following the dates by <u>which according to a schedule of work as identified in a Farm Environment Plan which</u> must be provided to the Council, or in any case no later than 1 July 2026."	Support in part	The submission point do not address FFNZ's concerns with the timeframe for completion although it recognises alternative mechanism through FEPs. In short FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that: <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3305	Policy 2	RETAIN Policy 2.	Oppose in part	FFNZ supports a tailored and risk based approach to managing diffuse discharges on a sub-catchment basis as set out in Policy 2. However, it considers that Policy 2 requires amendments to provide appropriate parameters around or a framework for assessing required actions as set out in FFNZ's submission on Variation 1.

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Waikato Dairy Leaders Group Submitter ID: 74049	PC1-11014	Policy 2	RETAIN Policy 2 guidance that PPC1 will manage all four contaminants by tailored Farm Environment Plans that allow landowners the flexibility to manage contaminants in a way that is most cost effective for each farm AND RETAIN the approach of having the same rigour in the requirements of the two alternatives: a council-managed Controlled Activity consent or a Permitted Activity in a Certified Industry Scheme.	Support	FFNZ supports a tailored and risk based approach to managing diffuse discharges on a sub-catchment basis as set out in Policy 2. However, it considers that Policy 2 requires amendments to provide appropriate parameters around or a framework for assessing required actions as set out in FFNZ's submission on Variation 1. FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.
Waikato Regional Council Submitter ID: 72890	PC1-2997	Policy 2	RETAIN Policy 2 AND AMEND Policy 2 to make it explicit that those dischargers who exceed the 75th percentile nitrogen leaching value, must reduce their nitrogen losses to the 75th percentile.	Oppose in part	Although FFNZ supports provisions that require those who discharge above 75 th percentile to reduce to the 75 th percentile it does not agree with the submitters that it should be part of policy 2. The reduction should be provided for as part of its framework as set out in FFNZ's submission on Variation 1.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11273	Policy 2	DELETE paragraph (b) from Policy 2.	Oppose	FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-12956	Policy 2	AMEND Policy 2 to renumber paragraph (c) as (b) AND ADD a NEW paragraph (c) to read: <u>"Encouraging enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change; and"</u>	Oppose in part	FFNZ opposes sub-catchment collectives managing contaminants for reasons including that this is likely to involve allocation (FFNZ does not support allocation), potentially gives significant power to catchment collectives, the potential for abuse of that power and the potential significant cost. In principle, FFNZ supports an adaptive management approach provided that this is not

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			<p>AND REPLACE paragraph (d) with the following: <u>"Where an adaptive management and mitigation approach for sub-catchment management is developed, assess and calculate risk-based input loads for each contaminant at a refined sub-catchment level. The input loads will be proportional to the Objective 1 freshwater objectives related to nitrogen, phosphorus, sediment and microbial pathogens for the surface waters that each refined sub-catchment is connected to. The input load for nitrogen will replace the Nitrogen Reference Point where an enterprise based consent for sub-catchment management is sought, proportional to the properties or enterprises collectively managed under existing Nitrogen Reference Point(s) values; and"</u></p> <p>AND AMEND to renumber paragraph (e) as (f)</p> <p>AND ADD a NEW paragraph (e) to read: <u>"Identifying mitigation actions that are to be set out to achieve Objectives 1 and 3 and implemented within either a sub-catchment management plan; Farm Environment Plan; an associated resource consent; or in specific requirements established by participation in any relevant Certified Industry Scheme; and"</u></p> <p>AND ADD a NEW paragraph (g) to read: <u>"Enterprises that reduce nitrogen, phosphorus, sediment and microbial pathogens are enabled."</u></p>		<p>based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available. However FFNZs concerns remain with the sub-catchment collective approach approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ considers that the submitter's proposed policy 2 (d) will give sub-catchment groups governance rights or allocates contaminants to sub-catchment collectives. Rather FFNZ considers that the discharge must be proportionate to the amount of the discharge, the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy and values and the particular sub-catchment characteristics not the matters referred to by the submitter.</p> <p>In regards to proposed new policy 2(e) FFNZ supports identifying mitigation actions but consider that it is more appropriately done through tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1. FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body.</p> <p>FFNZ concerns with proposed new policy 2 (g) is that it rewards those enterprises that has historically been high emitters compared to those that have historically been low emitters or have applied mitigation actions.</p>

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Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2087	Policy 2	AMEND Policy 2(d) to read as follows: "Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the <u>difference between current practices and the application of Best Management Practices</u> (those not currently applying mitigations are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and"	Oppose	FFNZ supports the implementation of good management practices but through the MPA framework set out in FFNZ's submission to Variation 1. FFNZ consider best management practices are too stringent. FFNZ opposes the submitter's proposed relief for 2d i. FFNZ considers that the discharge must be proportionate to the amount of the current discharge (not a hypothetical position as if best management practices have been applied).
Wallace, Martin Lindsay Submitter ID: 72975	PC1-12960	Policy 2	(Policy 2) AMEND 3.11.3.2 d) to read: "Requiring the degree of <u>Require</u> reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions) and proportionate to <u>(and other ecosystem health parameters) by the dischargers (progressively from the highest to the least) to the extent necessary to meet the scale of water quality improvement required in the sub-catchment [Reductions will be required from the highest dischargers until the water quality target is met]; and"</u>	Oppose	FFNZ has concerns that if the approach was adopted such that the highest nitrogen discharges had to reduce that would not take into account their particular circumstances e.g. a good farm system on leaky soils or high rainfall could be twice the nitrogen number of a poor farm system on better soils and low rainfall. It is not necessarily the high nitrogen farm that should or is able to reduce. FFNZ considers that funding and timeframes and/or a reasonable consenting process would need to be considered and available. FFNZ does not support a one size fits all approach. FFNZ considers that a tailored approach ought to be adopted.
Advisory Committee on Regional Environment (ACRE)	PC1-9508	Policy 3	AMEND Policy 3g) to read similar to: <u>"Require reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens by the dischargers (progressively from the highest to the least) to the extent necessary to meet the</u>	Oppose	FFNZ has concerns that if the approach was adopted such that the highest contaminant discharges had to reduce that would not take into account their particular circumstances e.g. a good farm system on leaky soils or high rainfall could be twice the nitrogen number of a poor

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 72441			<u>scale of water quality improvement required in the sub-catchment [Reductions will be required from the highest dischargers until the water quality target is met]."</u>		farm system on better soils and low rainfall. It is not necessarily the high nitrogen farm that should or is able to reduce. FFNZ does not support a one size fits all approach. FFNZ considers that a tailored approach ought to be adopted. For avoidance of doubt FFNZ considers that the discharge must be proportionate to the amount of the discharge, the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy and values and the particular sub-catchment characteristics.
AFFCO New Zealand Limited Submitter ID: 74140	PC1-7656	Policy 3	REPLACE references to 'BMP' and 'GMP' with 'BPO'. AND AMEND Policy 3(d) to read as follows: "A 10% decrease in the diffuse discharge of nitrogen... is achieved across the sector through the implementation of <u>best practicable options Best or Good Management Practices.</u> "	Support in part	FFNZ considers that any reduction ought to be considered and achieved through good management practices and MPA. It does not support the use of "best management practice" because it considers that this threshold is unreasonably and unrealistically high and too subjective. FFNZ opposes a blanket reduction of 10% in contaminants from commercial vegetable production. It considers that any reduction ought to be considered and achieved through good management practices and MPA. It does not support the use of "best management practice" because it considers that this threshold is unreasonably and unrealistically high and too subjective
A S Wilcox & Sons Ltd Submitter ID: 73142	PC1-4310	Policy 3	AMEND Policy 3 to provide for a Restricted Discretionary rule that enables opportunities for new vegetable production, with discharges assessed across all four contaminants	Support in part	FFNZ in its submission to Variation 1 seeks that commercial vegetable growing can continue as a controlled activity and can transfer to other sites (to recognise the rotational nature of this activity) as a controlled activity. Once the commercial vegetable growing activity leaves the parent

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND RETAIN the policy approach subject to consequential amendments to other policies and methods to give effect to the relief sought.		property, the parent property can apply for consent as a restricted discretionary activity under Rule 3.11.5.6 if the previous activity is not being replaced by another commercial vegetable growing activity.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10877	Policy 3	<p>AMEND Policy 3 to ensure consistency with the amendments sought in Appendix 1 of this submission</p> <p>AND AMEND Policy 3(a) to read: "a. Flexibility is provided to undertake crop rotations on changing parcels of land for commercial vegetable production, while reducing average contaminant discharges over time, <u>and while avoiding significant adverse effects;</u> and..."</p> <p>AND AMEND Policy 3(e) to read: "e. Identified mitigation actions are set out and implemented within timeframes specified in either a Farm Environment Plan and associated as part of a resource consent, or in specific requirements established by participation in a Certified Industry Scheme..."</p> <p>AND AMEND Policy 3(g) to read: "g. <u>Requiring</u> the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment in <u>accordance with the short and long term targets in Table 3.11-1, the sub-</u></p>	Oppose in part	<p>See FFNZ's reasons in its further submission on the submitter's submission points for Appendix 1.</p> <p>FFNZ opposes submitter's proposed amendments to Policy 3(a) because it considers the balance in 2a should be just between flexibility while still managing contaminants.</p> <p>FFNZ opposes submitter's proposed amendments to Policy 3(e) because it considers that mitigations in a FEP should not be conditions of a resource consent. FFNZ seeks that the actions and timing in FEPs are not conditions of consent. This is to provide flexibility to ensure that farming activities appropriately manage and respond to things such as adverse weather events, health and safety or animal welfare risks etc.</p> <p>Policy 3g) FFNZ considers that diffuse discharge should be managed and reduction should be proportionate in the context of several factors when reducing discharges. This is needed both to achieve the environmental outcomes and to achieve them at lowest social and economic cost. FFNZ considers that the discharge must be proportionate to the amount of the discharge, the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy and values and the particular sub-catchment characteristics. For these and</p>

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			<p><u>catchment reduction targets and timeframes in Table 3.11-2, and the sub-catchment nitrogen leaching requirements in Schedule E.; and...</u> AND ADD a NEW clause (h) to Policy 3 to read: <u>"Promoting and incentivising the use of riparian buffers to avoid sediment discharge."</u></p>		<p>other reasons FFNZ opposes the submission point.</p> <p>FFNZ opposes submitter's proposed policy 3(h). FFNZ consider that the riparian provisions are already too stringent and oppose more stringent provisions.</p>
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6863	Policy 3	<p>ADOPT Policy 3 as notified. AND AMEND (g) to read: "The degree of reduction... required in the sub-catchment, <u>with reductions guided by mitigations actions specified in a Farm Environment Plan and through implementation of Best Management Practices.</u>" AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	Support in part.	FFNZ supports the implementation of good management practices (best is too stringent and dsubjective) through the MPA framework set out in FFNZ's submission to Variation 1
Balle Bros Group Submitter ID: 67834	PC1-11407	Policy 3	<p>AMEND Policy 3 to read: "Policy 3: Tailored approach to <u>managing and where relevant</u> reducing diffuse discharges from commercial vegetable production systems... Manage and <u>where relevant</u> require reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from commercial vegetable production through a tailored, property or enterprise-specific approach where: a. Flexibility is provided to undertake crop rotations on changing parcels of land for commercial vegetable productions, while</p>	Support in part	<p>FFNZ considers that contaminant discharge need to be managed, as opposed to reduced. FFNZ also supports the additional phrase "where relevant".</p> <p>FFNZ also seeks deletion of Policy 3b).</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Accordingly it opposes the deletion of Policy 3c). FFNZ has concerns with policy 3d especially the blanket reduction contaminants from commercial vegetable production and the use of "best management practice" because it considers that</p>

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			<p>managing and where required reducing average contaminant discharges over time; and</p> <p>b. The maximum area in production for a property or enterprise is established and capped utilising commercial vegetable production data from the 10 years up to 2016; and</p> <p>c. Establishing a Nitrogen Reference Point or each property or enterprise; and</p> <p>d. A 10 % decrease in diffuse discharges of nitrogen and tailored reduction in diffuse discharges of phosphorus, sediment and microbial pathogens is achieved across the sector through the implementation of Best or Good Management Practices; and</p> <p>...</p> <p>g. The degree of reduction in diffuse discharges of nitrogen, phosphorus <u>and sediment and microbial pathogens</u> is proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and the scale of water quality improvement required in the sub-catchment."</p> <p>AND ADD a NEW Restricted Discretionary Activity consent applicable to high priority sub-catchments only.</p>		<p>this threshold is unreasonably and unrealistically high and too subjective. However FFNZ considers that the issues can be amended and does not require the deletion of the subclause.</p> <p>The reasoning behind the submitter's amendments to policy 3g is unclear and accordingly FFNZ does not support such amendments.</p> <p>Similarly until FFNZ sees the particular new Restricted Discretionary Activity provision it is not in a position to support it.</p>
Charion Investment Trust Submitter ID: 71344	PC1-7691	Policy 3	DELETE Policy 3. IF not deleted then AMEND Policy 3 (b) to read: "...b. The maximum area in production for a property or enterprise <u>in any single year</u> is established and capped <u>at the largest area in production for that property or</u>	Oppose	FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3. However, it considers that Policy 3 requires amendments as set out in FFNZ's submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>enterprise in any single year over the 10 year period ending 1 January 2016 as determined by utilising commercial vegetable production data from the 10 years up to 2016...</u></p> <p>AND AMEND Policy 3 (d) to read: "...d. A 10% decrease <u>by 2026</u> in the <u>rate of diffuse discharge of nitrogen relative to the Nitrogen Reference Point</u> and a tailored reduction in the diffuse discharge of phosphorus, sediment and microbial pathogens is achieved across the sector through the implementation of Best or Good Management Practices"</p> <p>AND REPLACE Policy 3 (g) with: "...g. <u>Requiring Farm Environment Plans to identify the areas and activities representing diffuse discharge risks and the most effective way of managing those risks on the particular property.</u>"</p>		<p>FFNZ opposes a cap on the maximum area for vegetable production. It is concerned that it will not be possible to provide for the wellbeing of the people of New Zealand as a whole, as is required by section 5 of the RMA, unless commercial vegetable production is allowed to expand into the Waikato to meet the needs of the growing populations of the surrounding areas of Auckland, the Bay of Plenty and the Waikato (subject to management of discharges).</p> <p>FFNZ opposes a one size fits all approach that requires 10% reductions (or something similar). FFNZ considers that a tailored approach ought to be adopted.</p> <p>FFNZ supports an approach based on considering sub-catchment characteristics and tailored and proportionate actions in FEPs. However for Policy 3g) regarding the degree of reduction of diffuse FFNZ consider it should be proportionate in the context of several factors. This is needed both to achieve the environmental outcomes and to achieve them at lowest social and economic cost.</p>
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10778	Policy 3	<p>AMEND Policy 3 (c): "Establishing a Nitrogen Reference Point for the property or enterprise for <u>the sole purpose of establishing an ability to reduce nitrogen loss</u>; and" Or words to like effect.</p>	Oppose	<p>FFNZ opposes Nitrogen Reference Point if it is used as benchmark, grandparenting of N or to allocate N.</p> <p>FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.</p>

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Department of Conservation Submitter ID: 71759	PC1-10653	Policy 3	AMEND Policy 3 to read as follows: "Manage and require reductions in <u>Reduce</u> diffuse discharges of nitrogen..." AND AMEND to provide clarity of the outcomes of the proposed wording 'reducing average contaminant discharges over time'. AND AMEND PPC1 to introduce a more efficient land-based allocation regime.	Oppose in part	FFNZ considers that manage of diffuse discharge is appropriate because reduction is not always required. FFNZ considers that contaminant discharges need to be managed , as opposed to reduced as accordingly seeks that reducing average contaminant over time be replaced with management contaminant discharges. Given the generality of the amendment sought in PPC1 FFNZ can only respond that it generally opposes Land Use Capability as an allocation method but reserves it position until it sees further particulars from the submitter.
Farm Environment Trust (Waikato) Submitter ID: 73798	PC1-5055	Policy 3	Policy 3: CLARIFY how the Farm Environment Plans link to targets that are set in Table 3.11-1 AND AMEND to consider the limitations of the OVERSEER Model when setting fixed reference points in catchments where nitrogen is not the issue AND ADD PPC1 a clearly outlined compliance policy.	Support in part Oppose in part	FFNZ in its submission to Variation 1 seeks amendments to Policy 3g) that links with the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy. The submitter did not state particulars to the rest of the submission point or the relief it seeks. Accordingly FFNZ is not in a position to support the relief sought by the submitter.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9731	Policy 3	AMEND Policy 3 to read: "Policy 3: Tailored approach to reducing diffuse discharges <u>to water</u> from commercial vegetable production systems. Manage and require reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to water</u> from commercial vegetable production, <u>and where over-allocated required reductions in these losses</u> through a tailored, property or enterprise-	Support in part Oppose in part	FFNZ supports amendments that clarifies that contaminant discharges need to be managed, as opposed to reduced. FFNZ opposes a cap on the maximum area for vegetable production but also a allocation of contaminants (which is what a maximum cap on contaminant loss for a property is). FFNZ opposes allocation of contaminants.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>specific approach where:</p> <p>...</p> <p>b. The maximum area in production <u>estimated contaminant loss</u> for a property or enterprise is established and capped, utilising commercial vegetable production data from the 10 years up to 2016; and:</p> <p>...</p> <p>d. in the diffuse discharge of phosphorus, sediment and microbial pathogen is achieved across the sector <u>for each sub-catchment by 2026</u>, through the implementation of Best or Good Management Practices; and</p> <p>...</p> <p>f. Commercial vegetable production enterprises that reduce <u>losses of</u> nitrogen, phosphorus, sediment and microbial pathogens are enabled; and</p> <p>g. The degree of reduction in diffuse discharges ... required in the sub-catchment <u>with reductions guided by mitigations set out in specified a Farm Environment Plan and through implementation of Good Management Practice.</u>"</p>		<p>As to the amendments for policy 3d) FFNZ does not support a one size fits all approach that requires 10% reductions (or something similar). FFNZ considers that a tailored approach ought to be adopted. FFNZ also oppose the submitters time frame although it agrees that Best Management Practices is to stringent and subjective.</p> <p>FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1. However for Policy 3g) regarding the degree of reduction of diffuse FFNZ consider it should be proportionate in the context of several factors. This is needed both to achieve the environmental outcomes and to achieve them at lowest social and economic cost.</p>
Fletcher Trust Submitter ID: 73848	PC1-5902	Policy 3	<p>DELETE Policy 3. OR AMEND Policy 3(b) to read as follows: "The maximum area in production for a property or enterprise <u>in any single year</u> is established and capped <u>at the largest area in production for that property or enterprise in any single year over the 10 year period ending 1 January 2016 as determined by</u> utilising commercial vegetation</p>	Oppose in part	<p>FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3. However, it considers that Policy 3 requires amendments as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ opposes a cap on the maximum area for vegetable production (policy 3(b)). It is concerned that it will not be possible to provide</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>production data from the 10 years up to 2016; and"</p> <p>AND AMEND Policy 3(d) to read as follows: "a 10% decrease <u>by 2026 in the rate of</u> diffuse discharge of nitrogen <u>relative to the Nitrogen Reference Point</u> and a tailored reduction in the diffuse discharge of phosphorus, sediment and microbial pathogens is achieved across the sector through the implementation of Best or Good Management Practices; and"</p> <p>AND REMOVE Policy 3(g) AND REPLACE with the following: "<u>Requiring Farm Environment Plans to identify the areas and activities representing diffuse discharge risks and the most effective way of managing those risks on the particular property.</u>"</p>		<p>for the wellbeing of the people of New Zealand as a whole.</p> <p>FFNZ opposes a one size fits all approach pf policy 3(d) that requires 10% reductions (or something similar). FFNZ considers that a tailored approach ought to be adopted.</p> <p>FFNZ supports an approach based on considering sub-catchment characteristics and tailored and proportionate actions in FEPs. However for Policy 3g) regarding the degree of reduction of diffuse FFNZ consider it should be proportionate in the context of several factors. This is needed both to achieve the environmental outcomes and to achieve them at lowest social and economic cost.</p>
<p>Fonterra Co-operative Group Ltd Submitter ID: 74057</p>	<p>PC1-10619</p>	<p>Policy 3</p>	<p>AMEND Policy 3 to read:</p> <p>"...b. The maximum are in production for a property or enterprise <u>in any single year is established and capped at the largest area in production for that property or enterprise in any single year over the 10 year period ending 1 January 2016 as determined by utilising</u> commercial vegetation production data from the 10 years up to 2016; and...</p> <p>d. A 10% decrease <u>by 2026 in the rate of</u> diffuse discharge of nitrogen <u>relative to the Nitrogen Reference Point and...."</u></p> <p>AND DELETE Policy 3 part g. AND REPLACE with the following: "...g. <u>Requiring Farm Environment Plans to identify the areas and activities</u></p>	<p>Oppose in part</p>	<p>FFNZ opposes a cap on the maximum area for vegetable production (policy 3(b)). It is concerned that it will not be possible to provide for the wellbeing of the people of New Zealand as a whole.</p> <p>FFNZ opposes a one size fits all approach pf policy 3(d) that requires 10% reductions (or something similar). FFNZ considers that a tailored approach ought to be adopted.</p> <p>FFNZ supports an approach based on considering sub-catchment characteristics and tailored and proportionate actions in FEPs. However also support the intent of Policy 3g) regarding the degree of reduction of diffuse FFNZ consider it should be proportionate in the</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>representing diffuse discharge risks and the most effective way of managing those risks on the particular property."</u>		context of several factors. This is needed both to achieve the environmental outcomes and to achieve them at lowest social and economic cost.
Gleeson, Graeme B Submitter ID: 73800	PC1-6418	Policy 3	<p>AMEND the timeframes for stock exclusion in Schedule C so that stock is excluded depending on the type of stock, the type of waterway stock is to be excluded from and the degree of slope. AND AMEND Schedule C to specify that slope means the dominant slope of the landscape. i.e. covers 80% or more of the landscape.</p> <p>AND AMEND so that where 80 percent of land is less than or equal to 15 degree slope, stock is excluded from perennial waterways by 2022.</p> <p>AND AMEND so that where 80 percent of land is less than or equal to 15 degree slope, stock is excluded from ephemeral waterways when they flow directly to a main waterway, accepting temporary fencing as a solution.</p> <p>AND AMEND to ensure stock exclusion occurs only in those areas identified as high risk,</p> <p>AND AMEND to ensure that in hill country, where dominant slope is greater than 15 degrees, stock exclusion occurs in critical source areas and where the cattle/deer stocking rate is greater than or equal to 1000kgLW/ha.</p> <p>AND AMEND to ensure the timeframes for stock exclusion align with those proposed nationally.</p>	Oppose in part	<p>FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that:</p> <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND to provide certainty about where and which waters need to be excluded from stock.</p> <p>AND AMEND to ensure that Farm Environment Plans provide mitigation against contaminants relevant to each farm, rather than a blanket approach.</p> <p>AND AMEND to enable stock to enter water bodies if they are being actively managed across the water body, and the water body is not crossed more than once a week.</p>		
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5604	Policy 3	AMEND Policy 3 so that it is consistent with the adoption of the Best Practicable Option approach proposed throughout the submission.	Oppose	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10052	Policy 3	<p>AMEND Policy 3 to read:</p> <p>"Manage and require reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from commercial vegetable production through a tailored, property or enterprise-specific approach to <u>consenting discharges</u> where:</p> <p>a. Flexibility is provided to undertake crop rotations on changing parcels of land for commercial vegetable production, while reducing average contaminant discharges over time; and</p> <p>b. The maximum area in production for a property or enterprise is established and capped utilising commercial vegetable production data <u>sourced</u> from the 10</p>	Oppose in part support in part	<p>FFNZ opposean approach that considers management of discharges only through resource consents. FFNZ considers that other non resource consent tools are relevant.</p> <p>FFNZ opposes a one size fits all approach in policy 3(d) that requires 10% reductions (or 5% or something similar). FFNZ considers that a tailored approach ought to be adopted.</p> <p>FFNZ has concerns about an approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives as sought by the submitter for policy 3e. FFNZ's concerns include that this may devolve power to</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>years up to 2016; and</p> <p>c. Establishing a Nitrogen Reference Point for each property or enterprise; and</p> <p>d. A 40% decrease in the diffuse discharge of nitrogen and a tailored reduction of no more than 5% through the implementation of Best or Good Management Practices in the diffuse discharge of nitrogen, phosphorus, and sediment is achieved across the sector through the while recognising:</p> <ul style="list-style-type: none"> • <u>the absent or low risk of discharges of microbial pathogens from commercial vegetable production;</u> • <u>the need to preserve aspects of commercial vegetable production required to maintain domestic supply of vegetables;</u> • <u>the pressure on and scarcity of land suitable for commercial vegetable production. This pressure has recently increased as a result of greenfields expansion onto versatile land in the Auckland region.</u> • <u>prior implementation of Best or Good Management Practices; and</u> <p>e. Identified mitigation actions that are set out and implemented within timeframes specified in either a Farm Environment Plan and associated resource consent, or in specific requirements established by participation in a Certified Industry Scheme <u>or a collective enterprise managing discharges as a group.</u></p> <p>f. Commercial vegetable production enterprises that reduce <u>can demonstrate</u></p>		<p>a particular group, may not result in water quality improvements and may impose significant cost.</p> <p>In regards to the submitter's amendments to policy3f) FFNZ concerns with proposed new policy is that it rewards those enterprises that has historically been high emitters compared to those that have historically been low emitters or have applied mitigation actions.</p> <p>FFNZ agrees that consents ought to be granted for at least 15 years and refers to the amendments to the policies and rules in FFNZ's submission Variation 1.</p> <p>In principle FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1).</p> <p>As to policy 3e), FFNZ opposes Nitrogen Reference Point if it is used as benchmark, grandparenting of N or to allocate N.</p> <p>FFNZ considers that it can be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>an overall reduction in the combined discharges of nitrogen, phosphorus, sediment and microbial pathogens (compared to the existing activity) are enabled; and</u></p> <p>g. The degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens is proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and the scale of water quality improvement required in the sub-catchment.</p> <p><u>h. Consent will generally be granted for a term greater than 15 years</u></p> <p><u>i. An offset measure may be proposed in an alternative location or locations to the non-point source discharge, for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that will or may result from allowing the activity provided that the:</u></p> <p><u>i. Primary discharge does not result in any significant toxic adverse effect at the non-point source discharge location; and</u></p> <p><u>ii. Offset measure provides an equivalent benefit for the values of freshwater specified in this plan; and</u></p> <p><u>iii. Offset measure occurs preferably within the same sub-catchment in which the primary discharge occurs and if this is not practicable, then within the same Freshwater Management Unit or a Freshwater Management Unit located</u></p>		<p>used for enforcement and compliance (see FFNZ's submission on Variation 1).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>upstream, and</p> <p>iv. Offset measure remains in place for the duration of the consent and is secured by consent condition."</p> <p>AND if Policy 3(c) is retained, AMEND to read:</p> <p>"Establishing a Nitrogen Reference Point for each property or enterprise</p> <p>Utilise proxy farm systems to approximate a Nitrogen Reference Point in recognition that OVERSEER is unlikely to identify a Nitrogen Reference Point for commercial vegetable production systems that is accurate enough for the purpose."</p>		
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9183	Policy 3	RETAIN Policy 3.	Support in part	FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3. However, it considers that Policy 3 requires amendments as set out in FFNZ's submission on Variation 1.
Mercury NZ Limited Submitter ID: 73182	PC1-9535	Policy 3	<p>RETAIN Policy 3</p> <p>AND AMEND Policy 3 (e) to read: "Policy 3: tailored approach to reducing diffuse discharges from commercial vegetable production systems/...</p> <p>e. Identified mitigation actions are set out and implemented within timeframes specified in either a Farm Environment Plan and associated resource consent, or in specific requirements established by participation in a Certified Industry <u>Sector</u> Scheme."</p>		<p>FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3. However, it considers that Policy 3 requires amendments as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that 'sector' is a better description than 'industry'.</p>
Ngati Haua Iwi Trust	PC1-11831	Policy 3	RETAIN Policy 3.	Support in part	FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3. However, it

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Submitter ID: 73515					considers that Policy 3 requires amendments as set out in FFNZ's submission on Variation 1.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6400	Policy 3	DELETE Policy 3 subject to any necessary amendments to give effect to the alternative approach proposed in the submission [to regulate land use on the basis of the Best Practicable Option and work toward allocation on a land use suitability approach] [overview of the alternative approach in Table 2 of submission].	Oppose in part	<p>FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3. However, it considers that Policy 3 requires amendments as set out in FFNZ's submission on Variation 1. In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc.</p> <p>FFNZ also oppose a land use suitability approach. Amongst other reasons, LUC was not designed for contaminant leaching and as a result the relationship between LUC and contaminants are unreliable. .</p>
Primary Land Users Group Submitter ID: 71427	PC1-11145	Policy 3	<p>AMEND Policy 3 to read: 'Policy 3: Tailored approach to "<u>managing and where relevant</u>" reducing diffuse discharges from commercial vegetable production systems...</p> <p>...Manage and "<u>where relevant</u>" require reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from commercial vegetable production through a tailored, property or enterprise-specific approach where:</p> <p>a. Flexibility is provided to undertake crop rotations on changing parcels of land for</p>		<p>FFNZ supports amendments that clarifies that contaminant discharges need to be managed, as opposed to reduced and that reduction is not always needed.</p> <p>FFNZ supports the NRP (policy 3c) provided it is used as a reference point and is not used to grandparent nitrogen.</p> <p>FFNZ agrees with the submitter that a one size fits all approach that requires 10% reductions (or something similar) is not appropriate. FFNZ</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>commercial vegetable production, while "managing and where required" reducing average contaminant discharges over time; and...</p> <p>...c. Establishing a Nitrogen Reference Point for each property or enterprise; and</p> <p>d. A 10% decrease in the diffuse discharge of nitrogen and a tailored reduction in the diffuse discharge of phosphorus, sediment and microbial pathogens is achieved across the sector through the implementation of Best or Good Management Practices; and"...</p> <p>...g. The degree of reduction in diffuse discharges of nitrogen, phosphorus "and" sediment "and microbial pathogens" is proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and the scale of water quality improvement required in the sub-catchment.'</p> <p>AND AMEND to provide clarification surrounding the movement of land with an enterprise under a controlled activity.</p>		<p>considers however that a tailored approach ought to be adopted.</p> <p>FFNZ understands that commercial vegetable production has a low risk of discharges of microbial pathogens and accordingly the submitter seeks the deletion of this contaminant. If science supports the understanding then FFNZ agrees there is merits in deleting the contaminant. However FFNZ considers its amendments to policy 3g) will address the concerns. FFNZ considers Policy 3g) should be proportionate in the context of several factors when reducing discharges. Amnogst other factors are the relevant sector's contribution towards the short term targets and progress towards achieving the Vision & Strategy and values and the particular sub-catchment characteristics which is where the low risk of microbial pathogens will be helpful.</p> <p>FFNZ in its submission to Variation 1 seeks that commercial vegetable growing can continue as a controlled activity and can transfer to other sites (to recognise the rotational nature of this activity) as a controlled activity. Once the commercial vegetable growing activity leaves the parent property, the parent property can apply for consent as a restricted discretionary activity under Rule 3.11.5.6 if the previous activity is not being replaced by another commercial vegetable growing activity.</p>

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Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7780	Policy 3	AMEND Policy 3 to reflect commercial vegetable production as an essential industry AND AMEND to reflect the requirement for land use flexibility in this industry AND DELETE the capping of the maximum land area in production AND DELETE the requirement for a Nitrogen Reference Point AND AMEND to enable a sub-catchment management approach.	Support in part	<p>FFNZ recognises the importance of commercial vegetable production and seek that commercial vegetable production is allowed to expand into the Waikato to meet the needs of the growing populations of the surrounding areas of Auckland, the Bay of Plenty and the Waikato (subject to management of discharges).</p> <p>FFNZ in its submission to Variation 1 seeks that commercial vegetable growing can continue as a controlled activity and can transfer to other sites (to recognise the rotational nature of this activity) as a controlled activity. Once the commercial vegetable growing activity leaves the parent property, the parent property can apply for consent as a restricted discretionary activity under Rule 3.11.5.6 if the previous activity is not being replaced by another commercial vegetable growing activity.</p> <p>Similar to the submitter FFNZ opposes a cap on the maximum area for vegetable production.</p> <p>However unlike the submitter FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen.</p> <p>FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis.</p>
Raukawa Charitable Trust Submitter ID: 74073	PC1-10550	Policy 3	RETAIN Policy 3.	Support in part	<p>FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3. However, it considers that Policy 3 requires amendments as set out in FFNZ's submission on Variation 1.</p>

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Ravensdown Limited Submitter ID: 74058	PC1-10104	Policy 3	AMEND Policy 3 to retain the overall intent but reword and clarify as follows: AMEND clauses b and c to address the difficulty of obtaining and verifying data from the previous 10 years for commercial vegetable production, and therefore of calculating a consistent and reliable Nitrogen Reference Point. AND AMEND clause d as follows: "A 10% decrease by 2026 in the..." AND AMEND clause g as follows: "The degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens is proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and the scale of water quality improvement required in the sub-catchment."	Support in part, oppose in part	<p>FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3. However, it considers that Policy 3 requires amendments as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ opposes a cap on the maximum area for vegetable production in policy 3b.</p> <p>FFNZ understands that especially for vegetable growers there is inaccuracies when using Overseer. That is way FFNZ only supports the NRP (policy 3c) provided it is used as a reference point (management tool to see where we are) and is not used to for allocation.</p> <p>FFNZ does not support a one size fits all approach that requires 10% reductions (or something similar). FFNZ considers that a tailored approach ought to be adopted.</p> <p>FFNZ consider Policy 3g) regarding the degree of reduction of diffuse should be proportionate in the context of several factors (see FFNZ's submission to Variation 1), not just the scale of water quality improvement required in the sub-catchment.</p>
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5670	Policy 3	Policy 3: REMOVE the use of OVERSEER Model or any other measuring tool in PPC1 until it is accurate both relatively and absolutely AND DELETE the use of benchmarking or allocation	Oppose in part	<p>FFNZ understands that especially for vegetable growers there is inaccuracies when using Overseer. That is way FFNZ only supports the use of Overseer as a on farm decision support tool and considers. It is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives</p> <p>AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves</p> <p>AND research a series of mitigations with strong data to support their efficacy and help introduce them. These will in combination with pollution levies have the greatest and fastest effect on water pollution</p> <p>AND DELETE the use of a proportional system in PPC1 and REPLACE with pollution levies.</p>		<p>outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ opposes Nitrogen Reference Point if it is used as benchmark, grandparenting of N or to allocate N. FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.</p> <p>FFNZ considers the bar of "best management practices" is too high and ought to be industry agreed GMP or similar.</p> <p>Similar to the submitter FFNZ supports science and research into mitigation actions.</p> <p>FFNZ supports a proportionate approach for reasons including that it is reasonable to assess required mitigations based on, amongst other things (see FFNZ's submission on Variation 1), the contribution to the problem.</p> <p>FFNZ does not support pollution levies for reasons, amongst others, including that it is a "blunt" instrument, not sufficiently tailored, not suited for diffuse discharges (which are difficult to directly measure) and is likely to result in significant cost for no net benefit. The proposal to base them on the assimilative capacity of land has additional issues including that there is no</p>

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					reasonable proxy for the assimilative capacity of land and it would amount to an allocation approach (which FFNZ does not support).
Spectrum Dairies Limited Partnership Submitter ID: 73958	PC1-2754	Policy 3	Policy 3: AMEND PPC1 to provide greater clarity for farms and more objectivity regarding land use change AND AMEND Policy 3 to reconsider the economic outfall and value loss from people leaving farming AND AMEND to include logical solutions that have positive economic and environmental effects AND undertake wider consultation, on a farm by farm basis.	Support	The submitter's concerns appear to be that the effects on economic and community wellbeing has not been appropriately considered when setting the numeric attribute states. If this is correct, FFNZ shares these concerns. FFNZ also support practical, sensible and affordable solutions.
Stark, Steven and Theresa Submitter ID: 73721	PC1-5092	Policy 3	DELETE Policy 3 in its entirety.	Oppose in part	FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3. However, it considers that Policy 3 requires amendments as set out in FFNZ's submission on Variation 1.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11780	Policy 3	RETAIN Policy 3.	Support in part	FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3. However, it considers that Policy 3 requires amendments as set out in FFNZ's submission on Variation 1.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8207	Policy 3	ADD a permitted activity rule that gives effect to Policy 3, AND requires the creation of a Nitrogen Reference Point, AND requires that the information necessary to verify the conditions have been complied with on an ongoing basis AND AMEND to ensure that any increase in diffuse discharged of contaminants associated with commercial vegetable	Oppose in part	FFNZ will, in principle, support a permitted activity rule that gives effect to Policy 3 as set out in its Submission on Variation 1. FFNZ supports NRP that is used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters. FFNZ opposes

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>production is treated as a non-complying activity AND DELETE reference to a 'tailored approach' AND DELETE Policy 3(f) AND AMEND to define good and best management practice in a schedule.</p>		<p>Nitrogen Reference Point if it is used as benchmark, grandparenting of N or to allocate N.</p> <p>FFNZ considers that the conditions for information seems too onerous and oppose such amendments.</p> <p>FFNZ opposes a non-complying activity status. FFNZ supports providing commercial vegetable growers with the option of a permitted activity or controlled activity consent. Amongst other reasons because this will likely impose significant cost for no net benefit, does not target resources to the contaminants most at issue and is unlikely to be practical. FFNZ refers further to the reasons set out in its submission on Variation 1.</p> <p>FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3.</p> <p>FFNZ supports policy 3(f) with amendments as set out in its submission to Variation 1.</p> <p>FFNZ supports the implementation of good management practices but through the MPA framework set out in FFNZ's submission to Variation 1. FFNZ consider best management practices are too stringent.</p>
<p>Tuwharetoa Maori Trust Board Submitter ID: 73356</p>	<p>PC1-10274</p>	<p>Policy 3</p>	<p>RETAIN Policy 3.</p>	<p>Support in part</p>	<p>FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3. However, it considers that Policy 3 requires amendments as set out in FFNZ's submission on Variation 1.</p>

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Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3306	Policy 3	RETAIN Policy 3.	Support in part	FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production as set out in Policy 3. However, it considers that Policy 3 requires amendments as set out in FFNZ's submission on Variation 1.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11277	Policy 3	AMEND Policy 3(d) to read: "A 10% decrease in the diffuse discharge of nitrogen <u>during Stage 1</u> and a tailored reduction approach in the diffuse discharge of phosphorus, sediment and microbial pathogens is achieved across the sector through the implementation of Best or Good Management Practices; and"	Oppose in part	FFNZ does not support a one size fits all approach that requires 10% reductions (or something similar). FFNZ considers that a tailored approach ought to be adopted.
A S Wilcox & Sons Ltd Submitter ID: 73142	PC1-4311	Policy 4	RETAIN Policy 4.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low. FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10878	Policy 4	AMEND Policy 4 to read: "Manage sub-catchment wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, and enable existing and new low discharging activities to continue provided that achievement of Objective 3 is not compromised <u>and significant adverse effects are avoided...</u> "	Oppose in part	FFNZ opposes submitter's because it considers the additional phrase is not necessary.

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Balle Bros Group Submitter ID: 67834	PC1-11408	Policy 4	AMEND Policy 4 to read: "Policy 4: Enabling activities with low discharges to continue or to be established while signaling further change may be required in future/Te Kaupapa Here 4: Te tuku kia haere tonu, kia whakaturia ranei nga tumahi he iti iho nga rukenga, me to tohu ake akuanei pea me panoni ano hei nga tau e heke mai ana".	Oppose in part	Although the submitters proposed amendments was only to the heading FFNZ consider the heading should remain because it better reflects the contents of Policy 4.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11488	Policy 4	AMEND Policy 4 so that it enables small scale land uses (<20ha), low intensity, and low discharging land uses to continue, to be flexible in their land use and their discharge of Nitrogen, and stocking rates, and to be established as set out under Policy 1. AND AMEND to introduce permitted thresholds based on the 'sustainable level' for the sub-catchment or Freshwater Management Unit. The 'sustainable level' can be based on Nitrogen loss per/kg/ha/year or alternatively kg live weight per ha relative to land use capability. Nitrogen loss rates should be based on either a permitted activity threshold using an equal allocation for a sub-catchment (e.g. 20kgN/ha/year) or Natural Capital based allocation or activity status (e.g. LUC), and relate to sub-catchment or Freshwater Management Unit specific desired in-stream Nitrogen loads. AND DELETE reference to future further reductions in contaminate discharges. AND AMEND to recognise existing biodiversity values on private land and	Oppose in part	FFNZ agrees that low intensity and low risk farming activities should be able to potentially intensify or have sufficient flexibility to reflect the nature of their activities. Generally FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. This recognises the level of risk associated with these activities and likely small environmental gain when compared to the economic and social costs of complying with and enforcing more stringent rules. However FFNZ opposes the adoption of 'sustainable level' as, amongst others, it uses LUC as method to allocate Nitrogen. FFNZ opposes both LUC as allocation method and allocation. FFNZ opposes the deletion of reference to future reductions because it consider it prudent to signal that future changes may be appropriate. FFNZ does not support the inclusion of biodiversity and considers provisions should focus on water quality and contaminants.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			that further establishment and protection of biodiversity is enabled and incentivised (as Policy 17 does).		
Buckley, Peter Ross Submitter ID: 71423	PC1-1402	Policy 4	RETAIN Policy 4 low intensity land uses to continue. AND DELETE any signalling of future mitigation action requirements.	Support in part and oppose in part	FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ opposes the deletion of reference to future reductions because it consider it prudent to signal that future changes may be appropriate.
Cameron, Bruce Submitter ID: 60603	PC1-6326	Policy 4	AMEND Policy 4 to REMOVE any signalling of future mitigation action requirements from Policy 4.	Oppose in part	FFNZ opposes the deletion of reference to future reductions because it consider it prudent to signal that future changes may be appropriate.
Charion Investment Trust Submitter ID: 71344	PC1-7722	Policy 4	REPLACE Policy 4 with: " <u>Policy 4. Enable existing farming activities or new activities that make a small contribution to contaminant loads and/or that pose a low risk of contaminant discharge because they:</u> <u>(a) occupy a small land area; and/or</u> <u>(b) have a low nitrogen discharge per hectare (and/or the land is not used for an intensive farming use);</u> <u>provided that high diffuse discharge risk practices are avoided.</u> <u>Advisory note:</u> <u>Activities and uses defined as low dischargers may in the future need to take mitigation actions that will reduce diffuse discharges or nitrogen, phosphorus, sediment and microbial pathogens in order for Objective 1 to be met.</u> " AND ADD a NEW Policy 4A to read: " <u>Enable existing farming activities that have a low risk of contaminant</u>	Support in part	FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>discharge for their farming type and/or a likelihood of diffuse discharge reductions over time because:</u> <u>(a) they are part of an industry scheme designed to manage diffuse discharge risk; and</u> <u>(b) the industry scheme includes a commitment to reduce the diffuse nitrogen discharge of the highest discharging 25% of farming activities within its scheme to a diffuse nitrogen loss rate that does not exceed the 75th percentile of all farming activities within the industry scheme."</u></p>		
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10779	Policy 4	RETAIN Policy 4 as currently worded.	Support in part	<p>FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low.</p> <p>FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them.</p>
Contact Energy Limited Submitter ID: 73714	PC1-7382	Policy 4	AMEND Policy 4 so it also applies to point source discharges.	Support in part	FFNZ supports equally and proportionally treatment for diffuse and point source discharges.
Department of Conservation Submitter ID: 71759	PC1-10655	Policy 4	<p>AMEND Policy 4 to provide clarity around the use of term cumulatively (ie the cumulative effects of each individual contaminant or of all contaminants together).</p> <p>AND AMEND to provide a definition for 'low discharging activities'.</p>	Support in part	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity. However until FFNZ has an opportunity to consider new wording ras sought by the submitter to clarify "cumulatively" "low discharging activities" "future" mitigation and "future

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND to provide greater specificity around the 'future' mitigation that is intended.</p> <p>AND AMEND to provide greater certainty about the future timeframe that is being referred to in the Policy.</p>		timeframes" FFNZ cannot support the new definitions an dclarifying wording.
Farmers 4 Positive Change (F4PC) Submitter ID: 73355	PC1-10423	Policy 4	<p>AMEND Policy 4 to enable small scale, low intensity and low risk land uses including forestry and farming to continue, to be flexible, and to be established</p> <p>AND AMEND to remove reference to further reductions in contaminate discharges</p> <p>AND AMEND to ensure existing biodiversity values are recognised and that further establishment and protection of biodiversity is enabled and incentivised.</p>	Support in part, oppose in part	<p>FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity.</p> <p>FFNZ opposes the deletion of reference to future reductions because it consider it prudent to signal to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes.</p> <p>FFNZ does not support the inclusion of biodiversity provisions and considers provisions should focus on water quality and contaminants.</p>
FarmRight Submitter ID: 73720	PC1-5388	Policy 4	<p>AMEND Policy 4 to clarify what is meant by 'low levels'.</p> <p>AND AMEND to establish a new controlled activity rule requiring any new discharging activity to be operating at best practice.</p> <p>AND AMEND Policy 4 to read: "Manage sub-catchment wide diffuse discharge of nitrogen, phosphorus, sediment E.coli and microbial pathogens, and enable existing and new low discharging activities <u>where appropriate, and subject to new activities establishing in accordance with industry standard management principles</u>, to continue</p>	Support in part Oppose in part	<p>FFNZ supports making provisions clear and certain for plan users by removing any ambiguity. However FFNZ does not support the relief sought by the submitter to clarify "low levels" because it can include high intensity discharges.</p> <p>FFNZ opposes a new controlled activity rule until it has an opportunity to consider the wording proposed but FFNZ can state that it has concerns with provision that refers to "best practice" because it considers that this threshold is unreasonably and unrealistically high and too subjective.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			provided ...diffuse discharges of nitrogen, phosphorus, sediment E.coli and microbial pathogens in order for Objective 1 to be met." AND AMEND so that for the purposes of Policy 4, 'low levels of contaminant discharge' is to mean 'discharges of nitrogen, phosphorus, microbial pathogens and/or E.coli which are below industry or sector standard practice levels for the relevant agricultural or rural sector or sub-sector and type of operation.'		FFNZ opposes the removal of sediment as it to is a water quality issue and also opposes making new activities subject to industry standard management principles.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9784	Policy 4	AMEND Policy 4 to read: "Enabling activities with lower discharges of <u>contaminant to water</u> to continue or to be established while signalling further change may be required in future. Manage sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, and enable existing and new <u>activities with low discharge</u> ing activities to water to continue provided that cumulatively the achievement of Objective 3 is not compromised. Activities and uses currently defined as low discharges <u>to water</u> may in the future need to take mitigation actions that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to water</u> in order for Objective 1 to be met."	Support in part	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.
Fletcher Trust Submitter ID: 73848	PC1-5914	Policy 4	REPLACE Policy 4 with the following: " <u>Enable existing farming activities or new activities that make a small contribution to contaminant loads and/or that pose a</u>	Support in part	FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>low risk of contaminant discharge because they:</u> <u>a) occupy a small land area; and/or</u> <u>b) have a low nitrogen discharge per hectare (and/or the land is not used for an intensive farming use); provided that high diffuse discharge risk practices are avoided.</u> <u>Advisory note: Activities and uses defined as low dischargers may in the future need to take mitigation actions that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens in order for Objective 1 to be met."</u> AND ADD a NEW Policy 4A to read as follows: "<u>Enable existing farming activities that have a low risk of contaminant discharge for their farming type and/or likelihood of diffuse discharge reductions over time because:</u> <u>a) they are part of an industry scheme designed to manage diffuse discharge risk; and</u> <u>b) the industry scheme includes a commitment to reduce the diffuse nitrogen discharge of the highest discharging 25% of farming activities within its scheme to a diffuse nitrogen loss rate that does not exceed the 75th percentile of all farming activities within the industry scheme."</u></p>		
Fonterra Co-operative Group Ltd	PC1-10471	Policy 4	AMEND Policy 4 to read: "Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required	Support in part	Generally FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. This recognises the level of risk associated with these

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 74057			<p>in future... Manage sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, and enable existing and new low discharging activities to continue provided that cumulatively the achievement of Objective 3 is not compromised. Activities and uses currently defined as low dischargers may in the future need to take mitigation actions that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens in order for Objective 1 to be met.</p> <p><u>Enable existing and new farming that individually and collectively make a minor contribution to contaminant loads and/or that pose a low risk of increased contaminant discharge because the activities:</u></p> <p><u>a. Occupy a small land area; and/or</u></p> <p><u>b. Have a low nitrogen discharge per hectare (and/or the land is not used for an intensive farming use);</u></p> <p><u>Provided that high risk diffuse discharge practices are avoided."</u></p> <p>AND ADD a NEW Policy 4A to read: <u>"Policy 4A: Signalling further change by lower discharging activities may be required in the future.</u></p> <p><u>Recognise that lower discharging activities may need to take additional mitigation actions to reduce diffuse discharges or nitrogen, phosphorus,</u></p>		activities and likely small environmental gain when compared to the economic and social costs of complying with and enforcing more stringent rules.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>sediment and microbial pathogens after 2026 in order for Objective 1 to be met."</u> AND ADD a NEW Policy 4AB to read: <u>"Policy 4AB: Enabling farming activities managed in accordance with industry schemes.</u> <u>Enable existing farming activities that have a low risk of increased contaminant discharge for their farming type and/or a likelihood of diffuse discharge reductions over time because:</u> <u>a. They are part of an industry scheme designed to manage diffuse discharge risk; and</u> <u>b. In accordance with that industry scheme the diffuse nitrogen discharge by those properties whose Nitrogen Reference Point is above the 75th percentile nitrogen leaching value for the relevant freshwater management unit^."</u></p>		
Gleeson, Graeme B Submitter ID: 73800	PC1-6419	Policy 4	AMEND the timeframes for stock exclusion in Schedule C so that stock is excluded depending on the type of stock, the type of waterway stock is to be excluded from and the degree of slope. AND AMEND Schedule C to specify that slope means the dominant slope of the landscape. i.e. covers 80% or more of the landscape. AND AMEND so that where 80 percent of land is less than or equal to 15 degree slope, stock is excluded from perennial waterways by 2022. AND AMEND so that where 80 percent of land is less than or equal to 15 degree slope, stock is excluded from ephemeral	Oppose in part, support in part	FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that: <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue. FFNZ agrees with the submitter to remove "blanket" rules and allowing the assessment on a case by case basis.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>waterways when they flow directly to a main waterway, accepting temporary fencing as a solution.</p> <p>AND AMEND to ensure stock exclusion occurs only in those areas identified as high risk,</p> <p>AND AMEND to ensure that in hill country, where dominant slope is greater than 15 degrees, stock exclusion occurs in critical source areas and where the cattle/deer stocking rate is greater than or equal to 1000kgLW/ha.</p> <p>AND AMEND to ensure the timeframes for stock exclusion align with those proposed nationally.</p> <p>AND AMEND to provide certainty about where and which waters need to be excluded from stock.</p> <p>AND AMEND to ensure that Farm Environment Plans provide mitigation against contaminants relevant to each farm, rather than a blanket approach.</p> <p>AND AMEND to enable stock to enter water bodies if they are being actively managed across the water body, and the water body is not crossed more than once a week.</p> <p>AND ADOPT a sub-catchment approach to focus on contaminants important to each farm and sub-catchment.</p> <p>AND ENSURE Farm Environment Plans assess appropriate land use options for each farm, and encourage better science to determine which contaminants are of concern for each farm and sub-catchment.</p>		<p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management.</p> <p>FFNZ consider that LUC can be used as a decision support tool to inform FEPS but nothing more.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. For these reasons, FFNZ supports this submission point. FFNZ opposes allocation and accordingly also opposes the live weight standards allocation proposed by the submitter.</p> <p>FFNZ opposes the use of Natural capital / LUC to set nitrogen or other contaminant limits or targets or to allocate contaminants. FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen or other contaminants, there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. For these reasons FFNZ does not agree with the submission points</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND DELETE requirements to manage farming activities to a historic Nitrogen Reference Point AND REPLACE with live weight standards linked to the natural capital of soils, climate and assimilative capacity of water OR allocate nitrogen as it is tied to the natural capital of soils.</p> <p>AND ENSURE greater understanding about spatial location of natural resources so this knowledge can be applied to better inform and manage contaminant loss.</p> <p>AND AMEND or ADD new rules that are based on land class and pasture production capability, where land use is supported by the capability of the land giving rise to contaminant loss no greater than acceptable ecosystem health limits.</p> <p>OR ADOPT equal nitrogen allocation flexibility for all land users (at 20kgN/ha) as a permitted activity.</p> <p>AND DELETE 75th percentile nitrogen leaching value AND REPLACE with requirements and standards that ensure the reductions required in over-allocated catchments, and where nitrogen is an issue, are proportionate to the level of improvement required and the impact of the discharge. Highest dischargers should be targeted first and consideration should be given to the economic implications of reducing and the timeframe for making reductions.</p> <p>AND AMEND the rules to ensure low contaminant loss land uses are a permitted activity.</p>		<p>on spatial location of natural resources, adding new rules based on land class.</p> <p>FFNZ agrees that flexibility ought to be provided for low nitrogen emitters. The threshold it proposes in its submission on Variation 1 is 15kgN/ha or some other appropriate permitted baseline. It would support the 20kgN/ha proposed by this submitter if this was supported by modelling (FFNZ does not have enough information at present to form a view on this particular threshold).</p> <p>FFNZ supports the use of the 75th percentile to require high nitrogen emitters to reduce. But considers an appropriate consenting pathway needs to be provided (as set out in its submission on Variation 1) where they cannot e.g. due to soil or climate they are high but they operate at GMP or higher. Accordingly FFNZ oppose the submission point.</p> <p>FFNZ oppose the submitters approach. FFNZ has concerns that if the approach was adopted such that the highest nitrogen discharges had to reduce that would not take into account their particular circumstances e.g. a good farm system on leaky soils or high rainfall could be twice the nitrogen number of a poor farm system on better soils and low rainfall. It is not necessarily the high nitrogen farm that should or is able to reduce.</p> <p>FFNZ does not support a one size fits all approach that requires 10% reductions (or</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND to ensure that high nitrogen dischargers, except horticulture, are required to reduce over time, starting immediately, and achieving 10% reductions every year for the life of PPC1.</p> <p>AND AMEND to ensure horticultural nitrogen losses are managed in a manner that recognises the value of the industry to the community.</p>		<p>something similar). FFNZ considers that a tailored approach ought to be adopted.</p> <p>FFNZ agrees that the value of horticulture to the community ought to be recognised but that the same applies to all activities.</p>
Hamilton City Council Submitter ID: 74051	PC1-10258	Policy 4	<p>AMEND Policy 4 to read: "Policy 4: <u>Enabling activities with discharges of lower volumes and concentrations of contaminants discharges</u> to continue or to be established while signalling further <u>change</u> <u>contaminant reductions</u> may be required in future.</p> <p>Manage sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, and enable existing and new <u>low discharging activities discharging low volumes and concentrations of these contaminants ('low dischargers')</u> to continue, or begin, provided that cumulatively the achievement of Objective 2 is not compromised. Activities and uses currently defined as low dischargers may in the future need to take mitigation actions that will reduce diffuse discharges or nitrogen, phosphorus, sediment and microbial pathogens in order for Objective 1 to be met."</p>	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.
Hancock Forest Management (NZ) Ltd	PC1-5608	Policy 4	AMEND Policy 4 to enable low discharge land uses such as forestry.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73724			AND AMEND to ensure that mitigation actions are applied to all farming activities taking into account relative contributions and risk.		stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.
Hill Country Farmers Group Submitter ID: 73321	PC1-7726	Policy 4	REMOVE for the policy reference to the requirement for future change. AND AMEND Policy 4 to read: "Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future..." AND AMEND Rule 3.11.5.2 stocking rate to 18 stock units per hectare.	Support in part	FFNZ opposes the deletion of reference to future reductions because it consider it prudent to signal to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes. FFNZ considers that Rule 2 needs to provide greater flexibility for small or low intensity properties. While it considers that this ought to be achieved through the amendments it proposed in its submission on Variation 1 e.g. the ability to increase to 15kgN or a similar permitted baseline, FFNZ would support any alternative that provides greater flexibility. On this basis it would support 18 stock units as proposed.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10055	Policy 4	RETAIN Policy 4 AND AMEND the definition of commercial vegetable cropping by deleting reference to asparagus.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity.
King Country Energy Limited Submitter ID: 60693	PC1-7839	Policy 4	RETAIN Policy 4. AND MAKE any similar amendments with like effect.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND MAKE any consequential amendments.		FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-9947	Policy 4	RETAIN Policy 4.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9184	Policy 4	RETAIN Policy 4.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them
Matamata-Piako District Council Submitter ID: 73419	PC1-3489	Policy 4	AMEND Policy 4 as per the relief set out under Policy 1 to provide for agreed, measurable and enforceable base lines for each of the four diffuse discharges that are required to be monitored on a	Support in part	In general FFNZ supports a “permitted baseline”. It would require particulars for each contaminant and how it is measured however before it can fully support such provisions. As for Nitrogen, FFNZ considers that a “permitted baseline” of either 15kgN (with farming activities able to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			case by case basis. Alternatively, delete reference to Objective 3. AND AMEND to read: "Policy 4: <u>Enable activities with discharges of low volumes and concentrations of contaminants to continue or to establish while signalling further contaminant reductions may be required.</u> "		increase up to it) or some other reasonable measure) ought to be provided. FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity which is different than what the submitter is seeking.
Miraka Limited Submitter ID: 73492	PC1-8816	Policy 4	AMEND Policy 4 to enable activities with lower discharges to continue or to be established, but with the requirement that they include best management practices for the mitigation of contaminant discharges in Farm Environment Plans and implement such mitigation practices.	Support in part	FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ supports the implementation of good management practices but through the MPA framework set out in FFNZ's submission to Variation 1. FFNZ consider best management practices are too stringent.
New Zealand Forest Owners Association Inc Submitter ID: 73524	PC1-9956	Policy 4	AMEND Policy 4 to enable low discharge land uses such as forestry. Ensure that mitigation actions are applied to all farming activities taking into account relative contributions and risk. AND MAKE any consequential amendments.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4612	Policy 4	RETAIN Policy 4.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
New Zealand Steel Ltd Submitter ID: 73790	PC1-3704	Policy 4	RETAIN Policy 4.	Support in part	<p>FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity.</p> <p>FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them.</p>
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11832	Policy 4	RETAIN Policy 4.	Support in part	<p>FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity.</p> <p>FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them.</p>
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6401	Policy 4	<p>AMEND Policy 4 to give effect to the reasons for the submission and so that it is consistent with the alternative approach proposed in the submission [to regulate land use on the basis of the Best Practicable Option and work toward allocation on a land use suitability approach] [An overview of the alternative approach can be found in Table 2 of the submission].</p> <p>AND AMEND the policy to enable low leaching activities and new low leaching activities such as forestry, while ensuring that existing farming activities adopt some Best Practicable Options, such as fencing stock from waterways.</p>	Oppose	<p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter in its alternative approach because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc. For avoidance of doubt FFNZ also opposes allocation and allocation on land use suitability approach (LUC was not designed for contaminant leaching and as a result the relationship between LUC and contaminants are unreliable).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND the heading to include the word 'diffuse' consistent with the policy wording/focus.		
Primary Land Users Group Submitter ID: 71427	PC1-11147	Policy 4	AMEND Policy 4 to read: 'Policy 4: Enabling activities with lower discharges to continue or to be established " while signalling further change may be required in future "...' AND AMEND the rules to provide future certainty for landowners AND DELETE the requirement for a Nitrogen Reference Point.	Support in part	FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them. FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen.
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7782	Policy 4	RETAIN Policy 4 AND CLARIFY the meaning of 'lower discharges'.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them.
R.P O'Connor and Sons Ltd Submitter ID: 71651	PC1-6956	Policy 4	AMEND the stock exclusion provisions of PPC1 so where the gradient makes fencing awkward, wetland silt traps/silt traps should be available as an option before discharging water downstream. AND AMEND PPC1 so the individual Farm Environment Plan mitigates against contaminants relevant to each farm rather than using a blanket approach.	Oppose in part, support in part	FFNZ considers that provisions about stock exclusion should be affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions broadly along the lines that: <ul style="list-style-type: none"> - Links the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord;

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>- Allow for alternative mechanism through FEP that addresses issue.</p> <p>FFNZ also supports a case by case assessment rather than a blanket approach.</p>
Raukawa Charitable Trust Submitter ID: 74073	PC1-10552	Policy 4	RETAIN Policy 4.	Support in part	<p>FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity.</p> <p>FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them.</p>
Ravensdown Limited Submitter ID: 74058	PC1-10105	Policy 4	<p>RETAIN the overall intent of Policy 4 but AMEND to address the following points:</p> <ul style="list-style-type: none"> Clarify the meaning of 'low discharging activity'; Define the date at which an activity needs exist to be considered existing; <p>Provide guidance on how it can be demonstrated that a low discharge activity cumulatively does not compromise Objective 3</p>	Support in part	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity. However until FFNZ has an opportunity to consider the replacement wording it cannot support them.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11100	Policy 4	<p>AMEND PPC1 to provide a definition or explanation of 'low discharges'.</p> <p>AND the submitter reserves its position, subject to acceptance of its relief sought elsewhere in its submission.</p>	Support in part	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity. However until FFNZ has an opportunity to consider the replacement wording it cannot support them.
South Waikato District Council	PC1-4040	Policy 4	AMEND Policy 4 to read: " <u>Enable activities with discharges of of low volumes and concentrations of</u>	Oppose in part	In general FFNZ supports a "permitted baseline". It would require particulars for each contaminant and how it is measured however before it can

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 72892			<u>contaminants to continue or to establish while signalling further contaminant reductions may be required.</u> AND AMEND to provide for agreed, measurable and enforceable baselines for each of the four diffuse discharges that are required to be monitored on a case by case basis.		fully support such provisions. As for Nitrogen, FFNZ considers that a “permitted baseline” of either 15kgN (with farming activities able to increase up to it) or some other reasonable measure) ought to be provided. FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity which is different than what the submitter is seeking.
Spectrum Dairies Limited Partnership Submitter ID: 73958	PC1-2757	Policy 4	Policy 4: AMEND PPC1 to provide greater clarity for farms and more objectivity regarding land use change AND AMEND Policy 4 to reconsider the economic outfall and value loss from people leaving farming AND AMEND to include logical solutions that have positive economic and environmental effects AND undertake wider consultation, on a farm by farm basis	Support in part	FFNZ agrees that flexibility for land use change needs to be provided. The submitter’s concerns appear to be that the effects on economic and community wellbeing has not been appropriately considered when setting the numeric attribute states. If this is correct, FFNZ shares these concerns. FFNZ also support practical, sensible and affordable solutions.
Stark, Steven and Theresa Submitter ID: 73721	PC1-5103	Policy 4	AMEND Policy 4 to read: "Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future ".	Support in part	FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11781	Policy 4	RETAIN Policy 4.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					progress towards the Vision & Strategy and values outcomes, but they will not alone meet them.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8256	Policy 4	AMEND Policy 4 to read as follows: "Manage sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, and enable existing and new low discharging activities to continue provided that cumulatively the achievement of Objective 3 is not compromised <u>provided there is no increase in diffuse discharges nitrogen, phosphorus, sediment and microbial pathogens.</u> "	Oppose	FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. The submitter's relief is contrary to the above as it makes provisions overly stringent.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10275	Policy 4	RETAIN Policy 4.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3307	Policy 4	RETAIN Policy 4.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them.
Waikato Regional Council	PC1-3002	Policy 4	RETAIN Policy 4.	Support in part	FFNZ supports a sub-catchment approach in policy 4 and supports the adoption of a less

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 72890					stringent provisions for farming activities on smaller properties or of a low intensity. FFNZ seeks amendments to the last part of Policy 4 to clarify that reductions in diffuse discharges from low discharges will assist with making progress towards the Vision & Strategy and values outcomes, but they will not alone meet them.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11344	Policy 4	ADD the following paragraph to Policy 4: <u>"Enabling enterprises to apply for sub-catchment management resource consent applications which include lower discharges from farming activities and commercial vegetable production, associated diffuse discharges, and land use change, will provide a key method (alongside participation in any relevant Certified Industry Schemes) for achieving clear and enduring improvements in water quality in order to meet (inter alia) Objectives 1 and 3 while allowing existing activities to continue and enabling new activities to be established."</u>	Oppose	FFNZ opposes sub-catchment collectives managing contaminants for reasons including that this is likely to involve allocation (FFNZ does not support allocation), potentially gives significant power to catchment collectives, the potential for abuse of that power and the potential significant cost.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2102	Policy 4	ADD the following to Policy 4: <u>"as long as there is no increase in discharges of nitrogen, phosphorus, sediment and microbial pathogens from property or enterprise."</u> AND ADD the following: <u>"enable activities with lower discharges to continue or to be established, but with the requirement that they include good management practices for the mitigation of contaminant discharges in Farm Environment Plans and implement such mitigation practices."</u>	Oppose	FFNZ supports the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity. The submitter's relief however seeks too stringent requirements.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
A S Wilcox & Sons Ltd Submitter ID: 73142	PC1-4312	Policy 5	RETAIN the Policy 5 staged approach AND MAKE any consequential amendments to policies and methods to give effect to the relief sought.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Bailey, James Submitter ID: 73926	PC1-9020	Policy 5	AMEND Policy 5 to replace the 'staged' approach with an 'Adaptive Management' approach to managing nitrogen and all contaminants AND AMEND PPC1 to recognise Land Use Suitability and Natural Capital as the basis of nitrogen management AND AMEND to enable transition toward the Vision and Strategy with Land Use Suitability as a starting point and using Adaptive Management as our understanding develops, reviewing and adapting through subsequent plan changes.	Oppose in part	In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available. FFNZ notes that the submitter promotes the adoption of Land Use suitability / Natural Capital. FFNZ does not understand whether that means that the submitter seeks the allocation of contaminants on the basis of LUC or the use of LUC as a decision support tool in preparing FEPs. Given the generality of the submission point FFNZ can only respond that it generally opposes Land Use Capability as an allocation method but reserves its position until it sees further particulars from the submitter.
Balle Bros Group Submitter ID: 67834	PC1-11409	Policy 5	AMEND PPC1 to ensure the rule framework gives effect to Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a view amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11489	Policy 5	AMEND Policy 5 to give effect to the following intent. "Recognise that achieving the water quality attribute targets in Table 3.11-1 <u>may require significant reductions in discharges from some land uses, in sub-catchments which are currently over allocated. As such timeframes will need to be staged over 80 years, to develop,</u>	Oppose in part	FFNZ does not support the long term attribute numbers in Table 3.11-1 however, it supports making progress towards the water quality outcomes anticipated by the Vision & Strategy and values and staging this over an 80 year period. FFNZ considers that Table 3.11-1 ought to be amended so that the water quality targets are achievable and farmers and communities remain prosperous in the interim. Accordingly FFNZ

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>while making a start on reducing discharges of Nitrogen, Phosphorus, sediment and microbial pathogens, and preparing for further reductions that will be required in subsequent regional plans. provide for investment in infrastructure, remediation, mitigation, innovation, and farm optimisation, and in recognition that achieving water quality restoration takes time due to lag phases between changes in land management approaches and establishment of on farm and edge of field mitigation and resultant water quality improvements."</p> <p>AND AMEND to tailor management approaches to address the specific contaminate(s) of concern on a sub-catchment basis.</p> <p>AND DELETE reference to further reductions through subsequent regional plans.</p> <p>AND AMEND to give effect to Objective 3 and 4 as proposed through this submission.</p> <p>AND AMEND to enable the establishment and operation of sub-catchment groups working through long term global consents to sustainably manage land and water resources, to adopt a staged approach to addressing water quality over allocation where it exists within the sub-catchment, to be innovative, to share and move resources as required within desired environmental limits/targets, to be flexible, to recognise</p>		<p>opposes the submission point on hardwired timeframes to the table.</p> <p>FFNZ agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ supports a sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere).</p> <p>FFNZ opposes deleting reference to subsequent regional plans because as knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>FFNZ refers to its further submission on the submitters submissions on Objective 3 and 4.</p> <p>FFNZ supports sub-catchment groups with group action plans to improve water quality in the sub-catchment. However, it has concerns about an approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ's concerns include that this may devolve power to a particular group, may not result in water quality improvements and may impose significant cost. FFNZ does not support the inclusion of biodiversity and considers</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>and provide for biodiversity values, and to adopt edge of field mitigation. AND AMEND Table 3.11-1 so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications. AND AMEND Policy 5 by extending timeframes to longer than 10 years, preferably 30 years.</p>		<p>provisions should focus on water quality and contaminants. FFNZ supports edge of field mitigation.</p> <p>FFNZ supports amendments to Table 3.11-1 so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications as set out in FFNZs submissions on Variation 1.</p> <p>FFNZ understands that proposed policy 5 timeframe is 80 years and would oppose it being reduced to 10 or 30 years.</p>
<p>Buckley, Peter Ross Submitter ID: 71423</p>	<p>PC1-1404</p>	<p>Policy 5</p>	<p>RETAIN Policy 5 the staged approach. AND ADOPT a sub-catchment management approach to ensure collaborative and fair management of resources AND AMEND to enable appropriate mitigation strategies to be adopted through a tailored Farm Environment Plan.</p>	<p>Support in part</p>	<p>FFNZ supports the staged approach in policy 5 (with a view amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.</p> <p>FFNZ supports a sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports sub-catchment groups with group action plans to improve water quality in the sub-catchment. However, it has concerns about an approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.
Cameron, Bruce Submitter ID: 60603	PC1-6327	Policy 5	RETAIN Policy 5 AND AMEND the rules in PPC1 to remove the Nitrogen Reference Point AND AMEND PPC1 to reflect Policy 1 in adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values. FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ supports a sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports sub-catchment groups with group action plans to improve water quality in the sub-catchment. However, it opposes an approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1
Charion Investment Trust Submitter ID: 71344	PC1-7748	Policy 5	AMEND Policy 5 to read: "Recognise that achieving the water quality attribute targets set out in Table 11-1 will need to be staged over 80 years, to minimise adverse social and economic effects disruption and allow for innovation and new practices to develop, while making a start on reducing discharges of nitrogen,	Oppose in part	FFNZ considers that the reference to making a start is more appropriate than to achieve Objective 3 because it considers this policy is to set the course for the long term aims not the short term goals.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			phosphorus, sediment and microbial pathogens, <u>to achieve Objective 3</u> and preparing for further reductions that will be required in subsequent regional plans."		
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10780	Policy 5	AMEND Policy 5 to create a clearer implementation path toward achievement of the long term targets, within the life of this plan.	Oppose in part	FFNZ does not agree with the numeric long terms targets in Table 3.11-1 and are accordingly opposed to hard wiring numeric targets now.
DairyNZ Submitter ID: 74050	PC1-10228	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Department of Conservation Submitter ID: 71759	PC1-10661	Policy 5	RETAIN Policy 5. AND AMEND PPC1 to provide greater clarity about how water quality targets will be achieved. AND AMEND to implement a land-based allocation regime that allocates the discharge of contaminants to ensure ecosystem health and to ensure that the potential of natural resources are retained to meet the reasonably foreseeable needs of future generations.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values. The amendments to policy 5 sought by the submitter to clarify how water quality targets will be achieved is unclear and accordingly FFNZ cannot support them. FFNZ oppose all allocation of contaminants and especially an allocation based on LUC.
FarmRight Submitter ID: 73720	PC1-5390	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9787	Policy 5	AMEND Policy 5 to read: "...microbial pathogens, and preparing for further reductions that will <u>may</u> be required in subsequent regional plans."	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Fletcher Trust Submitter ID: 73848	PC1-5934	Policy 5	AMEND Policy 5 to read as follows: "Recognise that achieving the water quality attribute targets set out in Table 3.11-1 will need to be staged over 80 years to minimise <u>adverse social and economic effects</u> disruption and allow for innovation and new practices to develop, while making a start on reducing discharges of nitrogen, phosphorus, sediment and microbial pathogens, <u>to achieve Objective 3</u> and preparing for further reductions that will be required in subsequent regional plans."	Oppose in part	FFNZ considers that the reference to making a start is more appropriate than to achieve Objective 3 because it considers this policy is to set the course for the long term aims not the short term goals.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10472	Policy 5	AMEND Policy 5 to read: "...Recognise that achieving the <u>desired</u> water quality attribute [^] states targets set out in Table 3.11-1 will need to be staged over 80 years, to minimise <u>adverse social and economic effects</u> disruption and allow for innovation and new practices to develop, while making a start on reducing discharges of nitrogen, phosphorus, sediment and microbial pathogens, <u>to achieve Objective 3</u> and preparing for further reductions that will be required in subsequent regional plans."	Oppose in part	FFNZ considers that the reference to making a start is more appropriate than to achieve Objective 3 because it considers this policy is to set the course for the long term aims not the short term goals.
Fulton Hogan Limited Submitter ID: 74048	PC1-10866	Policy 5	AMEND Policy 5 to read: "Recognise that achieving the <u>desired</u> water quality attribute [^] targets <u>states</u> set out in Table 11-1 will need..."	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.
GBC Winstone Submitter ID: 73992	PC1-3607	Policy 5	AMEND Policy 5 as follows: "Recognise that achieving the <u>desired</u> water quality attribute [^] targets <u>states</u> set out in Table..."	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.
Genesis Energy Limited	PC1-8738	Policy 5	RETAIN Policy 5 (in same or similar form).	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 74052					outcomes anticipated by the Vision & Strategy and values.
Gleeson, Graeme B Submitter ID: 73800	PC1-6431	Policy 5	<p>AMEND Policy 5 to adopt a sub-catchment approach to focus on contaminants important to each farm and sub-catchment.</p> <p>AND AMEND to ensure Farm Environment Plans assess appropriate land use options for each farm, and encourage better science to determine which contaminants are of concern for each farm and sub-catchment.</p> <p>AND DELETE requirements to manage farming activities to a historic Nitrogen Reference Point AND REPLACE with live weight standards linked to the natural capital of soils, climate and assimilative capacity of water OR allocate nitrogen as it is tied to the natural capital of soils.</p> <p>AND DEVELOP greater understanding about spatial location of natural resources so this knowledge can be applied to better inform and manage contaminant loss.</p> <p>AND AMEND or ADD new rules that are based on land class and pasture production capability, where land use is supported by the capability of the land giving rise to contaminant loss no greater than acceptable ecosystem health limits.</p> <p>OR ADOPT equal nitrogen allocation flexibility for all land users (at 20kgN/ha) as a permitted activity.</p> <p>AND DELETE the 75th percentile nitrogen leaching value AND REPLACE</p>	Oppose in part, support in part	<p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management.</p> <p>FFNZ consider that LUC can be used as a decision support tool to inform FEPS but nothing more.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. For these reasons, FFNZ supports this submission point. FFNZ opposes allocation and accordingly also opposes the live weight standards allocation proposed by the submitter.</p> <p>FFNZ opposes the use of Natural capital / LUC to set nitrogen or other contaminant limits or targets or to allocate contaminants. FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen or other contaminants, there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>with requirements and standards that ensure the reductions required in over-allocated catchments, and where nitrogen is an issue, are proportionate to the level of improvement required and the impact of the discharge. Highest dischargers should be targeted first and consideration should be given to the economic implications of reducing and the timeframe for making reductions. AND AMEND the rules to ensure low contaminant loss land uses are a permitted activity.</p> <p>AND AMEND to ensure that high nitrogen dischargers, except horticulture, are required to reduce over time, starting immediately, and achieving 10% reductions every year for the life of PPC1.</p> <p>AND AMEND to ensure horticultural nitrogen losses are managed in a manner that recognises the value of the industry to the community.</p>		<p>to recognise existing capital and on farm investment and land use. For these reasons FFNZ does not agree with the submission points on spatial location of natural resources, adding new rules based on land class.</p> <p>FFNZ agrees that flexibility ought to be provided for low nitrogen emitters. The threshold it proposes in its submission on Variation 1 is 15kgN/ha or some other appropriate permitted baseline. It would support the 20kgN/ha proposed by this submitter if this was supported by modelling (FFNZ does not have enough information at present to form a view on this particular threshold).</p> <p>FFNZ supports the use of the 75th percentile to require high nitrogen emitters to reduce. But considers an appropriate consenting pathway needs to be provided (as set out in its submission on Variation 1) where they cannot e.g. due to soil or climate they are high but they operate at GMP or higher. Accordingly FFNZ oppose the submission point.</p> <p>FFNZ oppose the submitters approach. FFNZ has concerns that if the approach was adopted such that the highest nitrogen discharges had to reduce that would not take into account their particular circumstances e.g. a good farm system on leaky soils or high rainfall could be twice the nitrogen number of a poor farm system on better soils and low rainfall. It is not necessarily the high nitrogen farm that should or is able to reduce.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>FFNZ does not support a one size fits all approach that requires 10% reductions (or something similar). FFNZ considers that a tailored approach ought to be adopted.</p> <p>FFNZ agrees that the value of horticulture to the community ought to be recognised but that the same applies to all activities.</p>
Greenplan Holdings Limited Submitter ID: 73893	PC1-2938	Policy 5	ADD NEW Policy 5 sub-catchment plans to help identify priority areas and the source point of contaminants, and what the true problem is AND Waikato Regional Council to work with landowners and the community to help implement positive change where there are identified problems.	Support in part	<p>FFNZ agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis.</p> <p>FFNZ supports sub-catchment groups with group action plans to improve water quality in the sub-catchment.</p>
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5630	Policy 5	AMEND Policy 5 to create a clearer implementation path toward achievement of the long term targets, within the life of PPC1.	Oppose in part	FFNZ does not agree with the numeric long terms targets in Table 3.11-1 and are accordingly opposed to hard wiring numeric targets now.
Hill Country Farmers Group Submitter ID: 73321	PC1-7728	Policy 5	AMEND Policy 5/PPC1 to replace blanket fencing requirement with using the Farm Environment Plan to adopt mitigation strategies for critical source areas.	Support in part	FFNZ considers that provisions about stock exclusion should be affordable, practical and sustainable. FFNZ oppose stock exclusion based on degree of slope. FFNZ recommends improvements to stock exclusion provisions including allowing for alternative mechanism through FEP that addresses issue.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10056	Policy 5	RETAIN Policy 5 AND clarify that discharge controls are not section 9 land use rules AND MAKE consequential amendments to other polices and methods.	Support in part	<p>FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.</p> <p>FFNZ also supports clarification that provisions is about discharge to water not land use.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
King Country Energy Limited Submitter ID: 60693	PC1-7841	Policy 5	RETAIN Policy 5. AND MAKE any similar amendments with like effect. AND MAKE any consequential amendments.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-9949	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9188	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Mercury NZ Limited Submitter ID: 73182	PC1-9537	Policy 5	AMEND Policy 5 to read: "Policy: Staged approach/.. Recognise that achieving the water quality attribute^ targets^ set out in Table 3.11-1 will need to be..."	Oppose	FFNZ does not support the long term attribute numbers in the table and according seeks reference to the water quality outcomes anticipated by the Vision & Strategy and values.
Miraka Limited Submitter ID: 73492	PC1-8819	Policy 5	AMEND Policy 5 to read as follows: "... staged over 80 years to minimise social disruption and economic hardship and allow for innovation and new practices to develop..." AND AMEND reference to Table 11-1 to be Table "3.11-1"	Support in part	FFNZ agrees that economic hardship is also a relevant consideration. FFNZ does not support the long term attribute numbers in the table and according seeks reference to the water quality outcomes anticipated by the Vision & Strategy and values.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4615	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
New Zealand Steel Ltd	PC1-3705	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73790					outcomes anticipated by the Vision & Strategy and values.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11833	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6403	Policy 5	AMEND Policy 5 to recognise the transition to the alternative approach proposed in the submission [to regulate land use on the basis of the Best Practicable Option and work toward allocation on a land use suitability approach]. This is to be implemented during the life of PPC1.	Oppose	FFNZ opposes the submitter's proposed amendments to policy 5 because FFNZ opposes the alternative approach by the submitter.
Primary Land Users Group Submitter ID: 71427	PC1-11151	Policy 5	AMEND PPC1 to ensure social disruption is minimised AND AMEND to ensure suitable indicators are identified to measure social disruption.	Support	FFNZ supports amendments so that the water quality targets are achievable and farmers and communities remain prosperous and social disruption is identified and minimised.
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7785	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10586	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Ravensdown Limited Submitter ID: 74058	PC1-10106	Policy 5	RETAIN the intent of Policy 5 as currently written.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5642	Policy 5	REMOVE the timeframe in Policy 5. AND AMEND PPC1 to require best current practices to be used for all polluting activities. AND AMEND PPC1 to require the most polluting activities be subject to the greatest mitigation requirements, penalties, oversight, research, measurement and regulation. Ensure however that there is room to innovate mitigations as new practices and methods develop.	Oppose in part	FFNZ considers that there should be long term water quality targets. FFNZ oppose reference to best current practice as it is too stringent and subjective. FFNZ opposes an approach which simply look s at highest discharges.
South Waikato District Council Submitter ID: 72892	PC1-4041	Policy 5	AMEND Policy 5 to read "..targets set out in Table 11-1 will need to be staged over <u>at least 80 years...</u> " AND AMEND to read: "....to minimise social disruption <u>on a sub-catchment or catchment basis...</u> "	Support in part	FFNZ shares the submitters concerns whether the targets are achievable in 80 years.
Spectrum Dairies Limited Partnership Submitter ID: 73958	PC1-2760	Policy 5	Policy 5: AMEND PPC1 to provide greater clarity for farms and more objectivity regarding land use change AND AMEND Policy 5 to reconsider the economic outfall and value loss from people leaving farming AND AMEND to include logical solutions that have positive economic and environmental effects AND undertake wider consultation, on a farm by farm basis	Support in part	FFNZ agrees that flexibility for land use change needs to be provided. The submitter's concerns appear to be that the effects on economic and community wellbeing has not been appropriately considered when setting the numeric attribute states. If this is correct, FFNZ shares these concerns. FFNZ also support practical, sensible and affordable solutions.
Stark, Steven and Theresa Submitter ID: 73721	PC1-5105	Policy 5	DELETE reference to Table 3.11-1 under Policy 5 and substitute the minimum standards as set out in the Ministry for the Environment's Clean Water document published February 2017, publication	Support in part Oppose in part	The submitter did not provide particulars on the recommendations in the government's clean water document and how it would be adopted and joined with the proposed provisions. In regards to stock exclusion FFNZ considers the that stock exclusion

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			number ME 1293; and within the National Objectives Framework in the National Policy Statement for Freshwater Management 2014. AND AMEND by allowing movement of water quality within a band. AND AMEND so that standards do not have to be upheld during flood events.		based on a slope criteria is too uncertain and requiring all stock to be excluded from all water bodies will impose significant cost for no net benefit. In regards to other recommendations without further particulars from the submitter FFNZ opposes adopting the recommendations amongst other reasons because there has been no evaluation whether the recommendations are the most appropriate way to achieve the objectives of PC1 and values of the Vision & Strategy nor have FFNZ been provided with details of the scale and significance of the environmental, economic, social and cultural effects on the Waikato region. FFNZ shares the submitter's concern that the numeric attribute states do not take into account or provide for bands or anomalies or spikes e.g. flood or other unforeseeable events that is not a trend. FFNZ agrees that the numeric targets ought to be amended to reasonably provide for this.
Taupo District Council Submitter ID: 74207	PC1-8109	Policy 5	RETAIN the intent of Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11782	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8257	Policy 5	AMEND Policy 5 to read: "Recognise that achieving the water quality attribute targets set out in Table 3.11-1 will need to be staged over 80 years to minimise social disruption and allow for innovation and new practices to develop, while making a start on reducing	Oppose	FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years (never mind shortening the overall time frame by more than half) when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			discharges of nitrogen, phosphorus, sediment and microbial pathogens, and preparing for further reductions that will be required in subsequent regional plans 35 years, requiring reductions immediately, and additional reduction in the medium to long term where these are necessary to achieve the targets."		understanding and knowledge, when the setting of the targets only considers some values but omits considering others.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10279	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3312	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Waikato Dairy Leaders Group Submitter ID: 74049	PC1-10936	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Waikato Environment Centre Submitter ID: 73436	PC1-6235	Policy 5	AMEND Policy 5 to recognise the potential off-sets to the costs of change, and the potential economic benefits, that will assist in limiting any social disruption.	Support	In principle FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1). However, it considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).
Waikato Regional Council Submitter ID: 72890	PC1-3004	Policy 5	RETAIN Policy 5.	Support in part	FFNZ supports the staged approach in policy 5 (with a few amendments) towards water quality outcomes anticipated by the Vision & Strategy and values.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11345	Policy 5	ADD the following to Policy 5: " <u>Ensuring that resource consent applications for farming activities and land use change include an appropriate assessment of risk</u>	Oppose in part	In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>and uncertainty based on sound adaptive management criteria. Encouraging enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change, will provide a key method (alongside participation in any relevant Certified Industry Schemes) for implementing a staged approach to achievement the freshwater objectives in Table 3.11 -1."</u>		FFNZ opposes global resource consents or an approach that gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ's concerns include that this may devolve power to a particular group, may not result in water quality improvements and may impose significant cost.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2106	Policy 5	AMEND Policy 5 to read as follows: <u>"Recognise that achieving the water quality attribute targets set out in Table 3.11-1 will need to be staged over 80 years, to minimise economic hardship and social disruption..."</u>	Support in part	FFNZ agrees that the not just social disruption should be minimised but also reduction in economic wellbeing.
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-9529	Policy 6	AMEND Policy 6 Paragraph 1 to read: <u>"Except as provided for in Policy 1 and 2 (for low level discharges) and Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted."</u>	Oppose in part	The amendments suggested by the submitter does not alleviate FFNZ's concerns with Policy 6. FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. For these reasons, FFNZ opposes this submission point.
Alcock, Carl and Jo Submitter ID: 73376	PC1-2101	Policy 6	AMEND Policy 6 by establishing policies and rules which relate to managing effects and are based on recognition of	Oppose in part	FFNZ agrees that there should be the ability to change land use as set out in FFNZ's submission on Variation 1. FFNZ agrees with the submitter to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>productive underlying soil properties rather than blanket rules based on existing land use</p> <p>AND AMEND by providing exceptions to land use change restrictions including for smaller land areas (below 40 hectares) and where environmental effects are minimal or advantageous</p> <p>AND AMEND by not limiting the restrictions and assessment of effects to consideration of the nitrogen discharges as modelled by the OVERSEER Model</p> <p>AND MAKE any consequential amendments arising.</p>		<p>remove “blanket rules” and rather make an assessment on a case by case basis.</p> <p>However, FFNZ opposes any allocation or land change regulations that are based on LUC or a policy that solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors.</p> <p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change. FFNZ is very concerned that as currently drafted, the plan does not provide a consenting pathway for increases in contaminants and it is likely to be very difficult to obtain a restricted discretionary activity consent and impossible to obtain a consent for land use change (unless the applicant can demonstrate that all contaminants will reduce).</p> <p>Such an outcome does not achieve sustainable management and is not effects based.</p> <p>FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for the restricted discretionary and proposed discretionary (for land use change) consents.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					Accordingly FFNZ seeks the submission point on LUC be disallowed and the submission point on specific exemptions for smaller properties be disallowed although it seeks that the basis of land change be effects based (but not just on Nitrogen but all contaminants) in accordance with FFNZ submission on Variation 1.
Alcock and Easton, Jo and John Submitter ID: 73374	PC1-9225	Policy 6	AMEND Policy 6 to allow for flexibility in land use change with provisions that relate to managing effects, and which are based on underlying soil properties and their productive potential, rather than blanket rules based on existing land uses AND AMEND to provide for exceptions to land use change for smaller land areas (below 40 hectares) and where the environmental effects are minimal or advantageous AND AMEND to ensure assessment of the effects are not limited to consideration of nitrogen discharges as modelled by the OVERSEER Model.	Oppose	<p>FFNZ agrees that there should be the ability to change land use as set out in FFNZ's submission on Variation 1. FFNZ agrees with the submitter to remove "blanket rules" and rather make an assessment on a case by case basis.</p> <p>However, FFNZ opposes any allocation or land change regulations that are based on LUC or a policy that solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors.</p> <p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change. FFNZ is very concerned that as currently drafted, the plan does not provide a consenting pathway for increases in contaminants and it is likely to be very difficult to obtain a restricted discretionary activity consent and impossible to obtain a consent for land use change (unless the applicant can demonstrate that all contaminants will reduce).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>Such an outcome does not achieve sustainable management and is not effects based.</p> <p>FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for the restricted discretionary and proposed discretionary (for land use change) consents.</p> <p>Accordingly FFNZ seeks the submission point on LUC be disallowed and the submission point on specific exemptions for smaller properties be disallowed although it seeks that the basis of land change be effects based (but not just on Nitrogen but all contaminants) in accordance with FFNZ submission on Variation 1.</p>
Allen, John Submitter ID: 73734	PC1-4897	Policy 6	AMEND Policy 6 to read: "Except as provided for in Policy 16 Land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted."	Oppose	FFNZ does not support this submission on the basis that it solely focuses on increases in diffuse discharges without consideration of particular sub-catchment characteristics, proportionality and other relevant factors.
Ashdale Enterprises Ltd Submitter ID: 72465	PC1-1673	Policy 6	AMEND Policy 6 to ensure consents are required for all land use including iwi ancestral land.	Oppose	FFNZ supports a reasonable consenting regime that is effects based as opposed to ownership based. FFNZ considers that this includes provision for certain farming activities as permitted activities. FFNZ also supports the certified industry scheme as a permitted activity as it provides farmers with choice as to whether

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					they want to obtain a consent from the council or deal with their industry body as a permitted activity.
Aston, Lucy Submitter ID: 73020	PC1-7042	Policy 6	<p>DELETE Policy 6. OR AMEND Policy 6 by removing blanket rules based on existing land use and establishing policies and rules which relate to managing effects based on the underlying soil properties. AND AMEND PPC1 so that land use change is permitted where environmental effects are minimal or advantageous (improvements in biodiversity, sediment or phosphorous retention, economic efficiency and optimisation of natural resources), including for land areas below 40 hectares. AND AMEND PPC1 so that restrictions and assessment of the effects is not limited to nitrogen discharges as modelled by OVERSEER. AND DELETE the Nitrogen Reference Point (grandparenting) provisions of PPC1.</p>	Support in part	<p>FFNZ considers that getting the policy context right and allowing the assessment on a case by case basis of activities such as land use change is the appropriate means to address issues. For these reasons FFNZ agrees with the submitter to remove “blanket rules”. However, FFNZ opposes the use of LUC to set contaminant limits or targets or to allocate contaminants. FFNZ also opposes any mechanism to allocate based on natural capital of soils.</p> <p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p>
Aston, Penelope Submitter ID: 73811	PC1-5351	Policy 6	<p>DELETE Policy 6. OR AMEND to ensure flexibility by removing blanket rules based on existing land use and establish policies and rules which relate to managing effects which recognise and are based on underlying soil properties. AND AMEND so that land use change is permitted where environmental effects are minimal or advantageous, such as improvements in biodiversity, sediment retention, phosphorous retention, economic efficiency and optimisation of natural resources (including for smaller land areas below 40 hectares). AND AMEND so that restrictions and an assessment of the effects is not limited to consideration of the nitrogen discharges as modelled by the OVERSEER Model. AND DELETE the nitrogen reference point (grandparenting) clauses and standards.</p>	Support in part	<p>FFNZ considers that getting the policy context right and allowing the assessment on a case by case basis of activities such as land use change is the appropriate means to address issues. For these reasons FFNZ agrees with the submitter to remove “blanket rules”. However, FFNZ opposes the use of LUC to set contaminant limits or targets or to allocate contaminants. FFNZ also opposes any mechanism to allocate based on natural capital of soils.</p> <p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in in contaminants and land use change. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND so that the application of rules is low cost, efficient and involves minimal bureaucracy.		<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p> <p>FFNZ considers that increase in contaminants and land use change can appropriately be managed through the application of MPA. FFNZ agrees with the submitter that application of rules should be low cost, efficient and involve appropriate monitoring, record keeping, reporting and information done effectively and efficiently by the consent holder to Waikato Regional Council.</p>
A S Wilcox & Sons Ltd Submitter ID: 73142	PC1-4313	Policy 6	AMEND Policy 6 to provide for activities that can demonstrate clear and enduring decreases in diffuse discharges as Restricted Discretionary Activity.	Oppose	FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					other relevant factors. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis. For these reasons, FFNZ opposes this submission point.
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6133	Policy 6	<p>AMEND Policy 6 as follows: Except as provided for in Policy 16, <u>Policy [X1]</u>, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted. Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted. AND ADD new policies as follows: <u>"Policy [X1] - Flexibility for land use change which commenced prior to 1 June 2015</u> <u>Land use change consent applications for properties or enterprises that commenced land use change activities prior to 1 June 2015 and that will not result in an increased diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens across a property or enterprise will generally be granted, taking into account:</u> <u>i. Implementation of best management practice actions for nitrogen, phosphorus, sediment and microbial pathogens for the</u></p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters).</p> <p>FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>proposed land use, including through the use of Farm Environment Plans for each property or enterprise; and</u></p> <p><u>ii. The creations of positive economic, social and cultural benefits for the Waikato Region.</u></p> <p><u>Policy [X2] - Flexibility for land use change</u></p> <p><u>Land use change consent applications for activities that will not result in an increased diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens across a property or enterprise will generally be granted, taking into account:</u></p> <p><u>i. Implementation of best management practice actions for nitrogen, phosphorus, sediment and microbial pathogen for the proposed land use through the use of Farm Environment Plans for each property or enterprise; and</u></p> <p><u>ii. The creation of positive economic, social and cultural benefits for the Waikato Region."</u></p>		
Atkinson, Richard Submitter ID: 73077	PC1-5210	Policy 6	AMEND Policy 6 to a land use capability model for nitrogen.	Oppose	FFNZ does not support nitrogen allocation and does not consider that LUC is an appropriate basis on which to allocate nitrogen.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10879	Policy 6	AMEND Policy 6 to read: "... Land use change consent applications that demonstrate clear <u>and</u> , enduring <u>and</u> meaningful decreases in existing diffuse discharges..."	Oppose	FFNZ is concerned that the proposed changes may result in the Policy becoming even more restrictive. FFNZ considers that Policy 6 is too restrictive and ought to be deleted and replaced with a new Policy that focuses on effects as set out in FFNZ's submission on Variation 1.
Babington, Cliff and Leonie	PC1-9463	Policy 6	DELETE Policy 6	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 72821					and cultural costs with no net environmental benefit.
Babington, Kelvin and Katherine Submitter ID: 71761	PC1-6698	Policy 6	DELETE Policy 6.	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Bain, Richard Alexander Submitter ID: 73936	PC1-3056	Policy 6	AMEND Policy 6 by allowing land owners to change land usage based on market changes, as long as nutrient levels remain as assessed to that property. For example, vegetable production, cropping and stock through flexible Farm Environment Plans.	Support in part	FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters). FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.
Baldwin, Jeremy and Alana Submitter ID: 71389	PC1-1043	Policy 6	AMEND Policy 6 so that land use change is a Controlled Activity.	Support in part	It is not clear what is meant by "Controlled Activity", if the submitter's point is consistent with FFNZ's submission that considers that an increase in contaminants and land use change can appropriately be managed through the application of MPA then FFNZ agrees with the submitter. Importantly, FFNZ considers that Policy 6 is too restrictive and ought to be deleted and replaced with a new Policy that focuses on effects as set out in FFNZ's submission on Variation 1.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6864	Policy 6	AMEND Policy 6 to read: "Except as provided for... will generally not be granted, <u>where this discharge occurs in</u>	Oppose	FFNZ does not support Policy 6. FFNZ is concerned that the proposed amendments will in reality make no difference to Policy 6. FFNZ does not support assessing over-allocation on the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>an over-allocated catchment or sub-catchment."</u> AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.		basis of the numbers contained in PC1 and refers to its concerns with the calculation of the 10 year and 80 year targets as set out in FFNZ's submission on Variation 1.
Balle, Patricia Katherine Submitter ID: 72557	PC1-4460	Policy 6	AMEND PPC1 to provide for land use change in high priority sub-catchments as a Restricted Discretionary Activity. AND AMEND PPC1 to provide for land use change in low priority sub-catchments as a Permitted Activity. AND AMEND to enable tailored Farm Environment Plans to adopt mitigation appropriate to the water quality gains to be made. AND AMEND PPC1 to address contaminants on a sub-catchment basis to ensure resources are fairly and collaboratively managed.	Support in part	FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters). FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.
Balle Bros Group Submitter ID: 67834	PC1-11410	Policy 6	DELETE Policy 6 in its entirety.	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Barton, Rachel and Jonathan Submitter ID: 71425	PC1-1663	Policy 6	AMEND Policy 6 to allow greater flexibility within farming systems and if they are trying to get more trees in that region and want to use blanket rules, that all land owners have to plant 10% of their land with trees, not just hill country sheep and beef farmers, with either plantation or native to offset emitting. AND AMEND to promote positive land use change that will help support rural regions for continued growth in the future.	Support in part Oppose in part	FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters). FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND to ensure that farming units that have excess of 18 Su/ha are limited AND AMEND to provide compensation to land owners in PPC1 is implemented.		<p>effects of such activities as set out in FFNZ's submission on Variation 1. FFNZ considers that an assessment on a case by case basis is an appropriate means to address issues and for this reason does not support "blanket rules".</p> <p>FFNZ would support an approach that considers the use of incentives and other public funds to provide compensation where there is a public good.</p>
B Das and Sons Ltd Submitter ID: 73689	PC1-9068	Policy 6	REMOVE Policy 6 and related provisions that discourage or make unduly difficult the ability to rotate crops onto new land based on the type of operation. AMEND Policy 6 to allow the ability to apply for a restricted discretionary consent for land use change to vegetable production for operations capable of demonstrating their practices reduce discharges.	Support in part	<p>FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters).</p> <p>FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.</p>
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11490	Policy 6	AMEND Policy 6 as follows: " Restricting land use change Restriction on intensive land uses and discharges to water..." AND AMEND to enable land use activities including changes in land use where increases in contaminant discharges still enable sub-catchment outcomes for water quality to be met including the values.	Support in part	FFNZ considers that getting the policy context right and allowing the assessment on a case by case basis of activities such as land use change is the appropriate means to address issues. For these reasons FFNZ agrees with the submitter to remove "blanket rules". However, FFNZ opposes the use of LUC to set contaminant limits or targets or to allocate contaminants. FFNZ also opposes any mechanism to allocate based on natural capital of soils.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND to enable changes in land use which occur within the sustainable level for the sub-catchment as set out in Policy 1.</p> <p>AND AMEND to take into account the degree to which land use is optimised in relation to the natural capital of soils, and sub-catchment water quality 80 year attributes targets (Table 3.11-1).</p> <p>AND AMEND to provide for increases in Nitrogen discharge where land use change will result in overall improvement in sustainable management and a decrease in soil loss, Phosphorus loss, management of microbial pathogens, and enhancement of biodiversity values.</p>		<p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in in contaminants and land use change. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.</p>
Bevege, Richard Neil Submitter ID: 74157	PC1-8196	Policy 6	DELETE Policy 6.	Support	<p>FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.</p>
Beverland, Chris Submitter ID: 73792	PC1-6876	Policy 6	<p>AMEND Policy 6 so that land use change does need regulation.</p> <p>AND AMEND so that a resources consent is needed to change from low intensity farming to any high intensity type (proving the land can handle the farm system).</p> <p>AND AMEND so that if an existing dairy farm goes out of production in a sensitive area it may not be consented back into to dairy farming.</p> <p>AND MAKE any consequential amendments including to the Objectives, Policies and Rules to give effect to the relief sought.</p>	Oppose	<p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change.</p> <p>FFNZ is does not agree with this submission as FFNZ considers that the proposed changes will result in the Policy becoming even more restrictive. FFNZ considers that Policy 6 is too restrictive and ought to be deleted and replaced with a new Policy that focuses on effects as set out in FFNZ's submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Beverland, Robert William Submitter ID: 73911	PC1-5195	Policy 6	DELETE Policy 6 in its entirety.	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Bolt Trust, King Country Partnership 2013 LP and Lone Pine Trust Submitter ID: 73539	PC1-6475	Policy 6	AMEND Policy 6 to allow land use changes to remain unconsented. AND AMEND PPC1 to recognise farmers who have taken action already and not penalise them. AND AMEND PPC1 so different farming systems and types of farming are treated differently.	Support in part	FFNZ considers that Policy 6 requires substantive amendment. It considers that it is appropriate to require consent for some types of land use change. FFNZ agrees that prior mitigations and actions to improve water quality ought to be recognised and provided for. FFNZ agrees that a tailored approach ought to be adopted to recognise and provide for different farm systems and types.
Briggs, Robin John Submitter ID: 73920	PC1-4971	Policy 6	AMEND Policy 6 to set a nitrogen cap of 30ks/N/ha for drystock farmers. AND AMEND Rules so that fencing of lakes, rivers and major interior creeks is required (not minor creeks). AND AMEND so that changing forestry land to dairy is not permitted. AND AMEND so that dairy conversions are strictly controlled to meet environmental expectations. AND AMEND so that high end Nitrogen capped farmers are controlled and pay for any excess nitrogen caps. AND MAKE any consequential amendments.	Oppose	FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change. FFNZ is does not agree with this submission as FFNZ considers that the proposed changes will result in the Policy becoming even more restrictive. FFNZ considers that Policy 6 is too restrictive and ought to be deleted and replaced with a new Policy that focuses on effects as set out in FFNZ's submission on Variation 1. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.
Brodie, Philip Donald Submitter ID: 67406	PC1-2854	Policy 6	AMEND Policy 6 to clarify if the Policy excludes urban land use change.	Oppose in part	FFNZ considers that all water quality issues (i.e. urban and rural) concerned ought to be considered and addressed. This issue will likely be addressed by the amendments FFNZ seeks to Policy 6.
Brooks, Hayden Gregory and Susan Jennifer Submitter ID: 71174	PC1-105	Policy 6	DELETE Policy 6 in its entirety.	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Browne, Allan Steward and Toni Rebecca Submitter ID: 71696	PC1-9162	Policy 6	AMEND Policy 6 to read: "Land use change consent applications that demonstrate clear and enduring decreases in exiting diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will be generally granted."	Oppose	FFNZ does not support Policy 6. FFNZ considers that the proposed amendments will make no difference to Policy 6.
Buckley, Carol Submitter ID: 71421	PC1-2542	Policy 6	AMEND PPC1 so that land use change is a Restricted Discretionary Activity in high priority sub-catchments, but a Permitted Activity in low priority catchments AND AMEND PPC1 to adopt a sub-catchment management approach AND AMEND to enable appropriate mitigation strategies to be adopted through a tailored Farm Environment Plan.	Support in part	FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>discretionary and proposed discretionary (for land use change) consents.</p> <p>FFNZ does not understand what is meant by “appropriate mitigation strategies”. If this submission point is consistent with FFNZ’s proposed amendments to Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change, FFNZ agrees with the submitter.</p>
Buckley, Peter Ross Submitter ID: 71423	PC1-1408	Policy 6	AMEND Policy 6 so that land use change is a permitted activity not non-complying AND AMEND PPC1 to adopt a sub-catchment management approach AND AMEND to enable appropriate mitigation strategies to be adopted through a tailored Farm Environment Plan.	Support in part	<p>FFNZ considers that Policy 6 requires substantive amendment. It considers that it is appropriate to require consent for some types of land use change.</p> <p>FFNZ agrees that prior mitigations and actions to improve water quality ought to be recognised and provided for.</p> <p>FFNZ agrees that a tailored approach ought to be adopted to recognise and provide for different farm systems and types.</p>
Cameron, Bruce Submitter ID: 60603	PC1-6337	Policy 6	AMEND PPC1 to state high priority sub-catchments in relation to water quality have a restricted discretionary activity status and low priority sub-catchments have a permitted activity status AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND to enable appropriate mitigation strategies to be adopted in the	Support in part	<p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change.</p> <p>FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			context of water quality gains to be made through a tailored Farm Environment Plan.		discretionary and proposed discretionary (for land use change) consents. FFNZ does not understand what is meant by “appropriate mitigation strategies”. If this submission point is consistent with FFNZ’s proposed amendments to Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change, FFNZ agrees with the submitter.
Chapman, Brenhan J Submitter ID: 72776	PC1-10221	Policy 6	Policy 6: ADD a Restricted Discretionary Activity status for operations capable of demonstrating clear and enduring decreases in existing diffuse discharges.	Oppose	FFNZ does not support Policy 6. FFNZ considers that the proposed amendments will make no difference to Policy 6. FFNZ does not support assessing over-allocation on the basis of the numbers contained in PC1 and refers to its concerns with the calculation of the 10 year and 80 year targets as set out in FFNZ’s submission on Variation 1.
Chapman, John K Submitter ID: 73086	PC1-10684	Policy 6	Policy 6: ADD a Restricted Discretionary Activity status for operations capable of demonstrating clear and enduring decreases in existing diffuse discharges.	Oppose	FFNZ does not support Policy 6. FFNZ considers that the proposed amendments will make no difference to Policy 6. FFNZ does not support assessing over-allocation on the basis of the numbers contained in PC1 and refers to its concerns with the calculation of the 10 year and 80 year targets as set out in FFNZ’s submission on Variation 1.
Chapman, Sharon M Submitter ID: 73084	PC1-10727	Policy 6	Policy 6: ADD a Restricted Discretionary Activity Rule for operations capable of demonstrating clear and enduring decreases in existing diffuse discharges.	Oppose	FFNZ does not support Policy 6. FFNZ considers that the proposed amendments will make no difference to Policy 6. FFNZ does not support assessing over-allocation on the basis of the numbers contained in PC1 and refers to its concerns with the calculation of the 10 year and 80 year targets as set out in FFNZ’s submission on Variation 1.

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Chapman, Victor J Submitter ID: 72779	PC1-10706	Policy 6	Policy 6: ADD a Restricted Discretionary Activity for operations capable of demonstrating clear and enduring decreases in existing diffuse discharges.	Oppose	FFNZ does not support Policy 6. FFNZ considers that the proposed amendments will make no difference to Policy 6. FFNZ does not support assessing over-allocation on the basis of the numbers contained in PC1 and refers to its concerns with the calculation of the 10 year and 80 year targets as set out in FFNZ's submission on Variation 1.
Charion Investment Trust Submitter ID: 71344	PC1-7747	Policy 6	DELETE Policy 6 and all associated Rules.	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Chhagn Bros Co Ltd Submitter ID: 73762	PC1-5561	Policy 6	AMEND Policy 6 by providing a Restricted Discretionary activity for operations capable of demonstrating clear and enduring decreases in existing diffuse discharges.	Oppose	FFNZ does not support Policy 6. FFNZ considers that the proposed amendments will make no difference to Policy 6. FFNZ does not support assessing over-allocation on the basis of the numbers contained in PC1 and refers to its concerns with the calculation of the 10 year and 80 year targets as set out in FFNZ's submission on Variation 1.
Clapcott, Anson Submitter ID: 73149	PC1-4212	Policy 6	AMEND Policy 6 to enable improvements to some classes of land.	Support in part	FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters). FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.
Clapcott, Sarah V	PC1-5006	Policy 6	AMEND Policy 6 by proposing an alternative where some classes of land	Support in part	FFNZ considers that a more appropriate way to deal with the flexibility required for things like

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Submitter ID: 73723			should not be developed further but in other cases land should be allowed to be improved.	Oppose in part	nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.
Clayton-Greene, Cindy and Warren Submitter ID: 71426	PC1-1218	Policy 6	DELETE Policy 6 and REPLACE with a new policy that provides flexibility, farm by farm on each property merits.	Support	<p>FFNZ agrees that Policy 6 is not appropriate and ought to be deleted. FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters).</p> <p>FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.</p> <p>For these reasons, FFNZ agrees with this submission.</p>
Clements, Robyn Ethel Submitter ID: 73097	PC1-7967	Policy 6	DELETE Policy 6 in its entirety OR AMEND to ensure provision is made for method that looks at land use capability to assess land.		<p>FFNZ agrees that Policy 6 is not appropriate and ought to be deleted. FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters).</p> <p>FFNZ opposes the use of LUC to set contaminant limits or targets or to allocate contaminants. FFNZ also opposes any mechanism to allocate based on natural capital of soils. FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10781	Policy 6	DELETE Policy 6.	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Coleman, Mark and Ruth Submitter ID: 71424	PC1-7399	Policy 6	DELETE Policy 6 for sheep and beef farms. AND MAKE any consequential amendments.	Support in part	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted but for all farm types for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.
Crichton, John Submitter ID: 73065	PC1-8373	Policy 6	DELETE Policy 6 in its entirety. If not deleted then AMEND to provide for water pollution to be addressed by other methods.	Support in part	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Cronin, G Submitter ID: 74030	PC1-4089	Policy 6	DELETE Policy 6.	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
DairyNZ Submitter ID: 74050	PC1-10230	Policy 6	AMEND Policy 6 to read: "Policy 6: Restricting land use change/ Te kaupapa... Except as provided for in Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted. Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted. <u>Land use changes will generally be approved, where the mitigations proposed in the Farm Environment Plan;</u> <u>a. do not increase the discharges of phosphorus, sediment and microbial contaminants, and</u> <u>b. can demonstrate there will be no increase in the nitrogen reference point."</u>	Oppose	FFNZ does not support proposed Policy 6 or the submission point. Although FFNZ agrees that land use change ought to be planned for, FFNZ considers Policy 6 (and the submitter's suggested amendments) focuses just on increases on diffuse discharges without being effects based or taking into account particular sub-catchment characteristics, proportionality and other relevant factors. FFNZ agrees that prior and future mitigations and actions to improve water quality ought to be recognised but as stated before considers other factors ought to be also considered. FFNZ seeks flexibility when managing land use change within appropriate parameters as set out in FFNZ's submission on Variation 1. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis. Accordingly FFNZ does not support the submission point.
Dean, David Submitter ID: 73782	PC1-4614	Policy 6	DELETE Policy 6 OR AMEND so that Policy 6 applies to all equally.	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Denize, Mathew John Submitter ID: 72701	PC1-7627	Policy 6	AMEND PPC1 to give land use change in sub-catchments of high priority for water quality a Restricted Discretionary Activity status and in low priority sub-catchments a Permitted Activity status,	Support in part	FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment, AND AMEND to enable appropriate mitigation strategies through tailored Farm Environment Plans.		FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents. FFNZ does not understand what is meant by “appropriate mitigation strategies”. If this submission point is consistent with FFNZ’s proposed amendments to Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change, FFNZ agrees with the submitter.
Department of Conservation Submitter ID: 71759	PC1-10664	Policy 6	AMEND Policy 6 to provide greater direction to decision makers when they are considering applications for a non-complying land use change under Rule 3.11.5.7. ALTERNATIVELY, CONSIDER introducing a Prohibited Activity rule in place of 3.11.5.7 to avoid adverse effects of land use change on water quality.	Oppose	FFNZ already consider the proposed policy 6 is too restrictive, inflexible and unreasonable. Accordingly, FFNZ does not support an even stricter approach by making land use change a non-complying activity. While FFNZ agrees that clarity around factors to be taken into account in considering applications for land use change would be helpful, it considers that this ought to be done through an RD and discretionary activity consenting framework with clarity as to decision-making factors as set out in the new Policy 6 that FFNZ proposes on its submission on Variation 1.
Dorreen, Ian David and Bronwyn Nugent Submitter ID: 73991	PC1-8502	Policy 6	DELETE Policy 6 AND MAKE any other consequential amendments.	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Dunlop, Tania	PC1-619	Policy 6	DELETE Policy 6 and REPLACE with a new land use change policy that covers	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 71249			the whole country and applies to all land equally AND DELETE all references to the Nitrogen Reference Point and consider individual farm issues AND DELETE the use of the OVERSEER Model and REPLACE with a program that is easy to use, land owners can set up and works.		will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Edmonds, Suzanne Louise Submitter ID: 71085	PC1-1115	Policy 6	AMEND Policy 6 to take into account the beneficial land use changes that have been and will be undertaken by farmers.	Oppose in part	FFNZ seeks that Policy 6 is not appropriate and ought to be deleted; however, FFNZ agrees that prior and future mitigations and actions to improve water quality ought to be recognised and provided for.
Eight Mile Farms Ltd Submitter ID: 71395	PC1-1162	Policy 6	DELETE Policy 6 AND CONSIDER replacing with a policy for land use capability through a Farm Environment Plan.	Support in part Oppose in part	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit. FFNZ opposes the use of LUC to set contaminant limits or targets or to allocate contaminants. FFNZ also opposes any mechanism to allocate based on natural capital of soils.
Ewen, Andrew Hamish and Nicole Lisa Submitter ID: 71210	PC1-295	Policy 6	DELETE Policy 6 in its entirety	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9788	Policy 6	AMEND Policy 6 to read: "Except as provided for in Policy 16...sediment or microbial pathogens <u>to water which will potentially result in deterioration of water quality</u> will generally not be granted.	Oppose in part	FFNZ understands that the proposed changes are to restrict the application of Policy 6. However, FFNZ has concerns that this does not sufficiently address the issues of Policy 6 including the significant cost that will be placed

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens <u>to water</u> will generally be granted."		on the community as a result of pre-empting many land use change applications and for no net environmental benefit. Accordingly, FFNZ does not support simply "tinkering" with Policy 6 and instead seeks the deletion of the Policy and substitution of a new Policy as set out in FFNZ's submission on Variation 1.
Findlay, Andrew Submitter ID: 72021	PC1-8285	Policy 6	DELETE Policy 6 AND AMEND the PPC1 approach to land use change to encourage good farming practice and not make rules.	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Findlay, James Thomas Submitter ID: 73509	PC1-9859	Policy 6	AMEND Policy 6 provide clarification and further definitions of land use change and land use intensification AND AMEND to clarify what would constitute an enduring decrease in existing discharges in land use change applications.	Oppose	FFNZ considers that the proposed amendments do not sufficiently address the issues of Policy 6. Accordingly, FFNZ does not support simply "tinkering" with Policy 6 and instead seeks the deletion of the Policy and substitution of a new Policy as set out in FFNZ's submission on Variation 1.
Fletcher Trust Submitter ID: 73848	PC1-5941	Policy 6	DELETE Policy 6 and all associated rules.	Support	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit.
Fong, Dennis Submitter ID: 71758	PC1-9565	Policy 6	AMEND Policy 6 so land use change remains a permitted activity when supported by a Farm Environment Plan, risk analysis and ongoing water testing.	Support in part	FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use changes. FFNZ considers that allowing the assessment on a case by case basis of activities such as land use

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					change is the appropriate means to address issues.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10473	Policy 6	DELETE Policy 6 and REPLACE to read: " <u>...Manage the potential for increases in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens by generally only allowing land use change where it would:</u> a. <u>Not result in increased diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens; and/or</u> b. <u>Promote the implementation of Policy 16.</u> "	Support in part Oppose in part	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted for reasons including that it will likely to result in significant, social, economic and cultural costs with no net environmental benefit. FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis. For these reasons, FFNZ opposes this submission point.
Fonterra Shareholders Council Submitter ID: 72610	PC1-10638	Policy 6	AMEND Policy 6 to include an additional clause that sets out that it is generally acceptable for land use change where the effects are either neutral or reduce contaminants. AND AMEND Policy 6 so that it does not capture changes occurring as part of normal farming practice, and are otherwise managed by the Nitrogen Reference Point.	Support in part Oppose in part	FFNZ agrees that Policy 6 is not appropriate and ought to be deleted. FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters). FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.
Frederikson, Mark Gordon	PC1-8726	Policy 6	AMEND Policy 6 so that farms are assessed individually based on Land	Support in part	FFNZ agrees that farms ought to be assessed individually through tailored and proportionate

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73118			Environment Plans and should be allowed to intensify if they have low outputs. AND AMEND to recognise when applying for resource consent for land use change that some farms have already retired significant areas of land.		FEPs. FFNZ also agrees that there should be a consenting pathway for nitrogen increases and a permitted activity for nitrogen increases below a permitted baseline (as set out in FFNZ's submission on Variation 1). FFNZ agrees that prior mitigations and water quality improvements ought to be recognised and provided for.
Fursdon, Sonia Submitter ID: 73999	PC1-9324	Policy 6	AMEND Policy 6 to give more weight to potential economic opportunities associated with diversifying industry and income streams.	Support	FFNZ agrees that PC1 ought to incentivise innovation and new technology to mitigate adverse effects on water quality. FFNZ is concerned that Policy 6 will not provide for this and therefore, FFNZ considers that Policy 6 ought to be deleted.
Gaston, Jo and Andrew Submitter ID: 71267	PC1-1001	Policy 6	DELETE Policy 6 in its entirety and REPLACE with provisions that address the specific issue of intensification of the dairy industry AND AMEND to consider other farming operations on their merits such as a discretionary basis under strict criteria on a sub-catchment basis AND MAKE any consequential amendments arising from this submission.	Oppose	Save for agreeing that Policy 6 is not appropriate and ought to be deleted FFNZ opposes the submission. FFNZ consider it unfair to treat a sector of farmers differently based, not on effects of the activity, but rather solely on the type of farming. FFNZ promotes an effects based approach regardless of the sector of agriculture. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis as set out in FFNZ's submissions to variation 1. FFNZ also opposes a discretionary activity status for land use change and seeks amendments to Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.

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Gaudin, Philip and Pauline Submitter ID: 72820	PC1-9086	Policy 6	DELETE Policy 6 in its entirety IF NOT DELETED, then AMEND to provide for Farm Environment Plans to consider each individual farm's capabilities.	Support in part	FFNZ agrees that Policy 6 is not appropriate. FFNZ also agrees on a case by case approach. FFNZ however consider that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this as set out in FFNZ's submission on Variation 1.
Genetic Technologies Ltd Submitter ID: 73953	PC1-3252	Policy 6	AMEND Policy 6 to read: "Land use change consent applications ... phosphorus, sediment or microbial pathogens <u>or no increase above an accepted best practice level</u> will generally be granted."	Oppose	FFNZ does not consider that the amendments proposed by the submitter will overcome the issues FFNZ has with the proposed policy. FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis. For these reasons, FFNZ opposes this submission point.
Goodwright, Sydney Alfred Submitter ID: 72983	PC1-4364	Policy 6	AMEND Policy 6, so that high priority water quality sub-catchments are a restricted discretionary activity. AND AMEND so that low priority water quality sub-catchments are a permitted activity. AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair	Support in part	FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change which does take into account the characteristics of the sub-catchment. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA,

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>management of resources within each sub-catchment. AND AMEND so that appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.</p>		<p>monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.</p> <p>FFNZ does not understand what is meant by “appropriate mitigation strategies”. If this submission point is consistent with FFNZ’s proposed amendments to Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change, FFNZ agrees with the submitter.</p>
<p>Grainger, Chris and Andrea Submitter ID: 74153</p>	<p>PC1-7099</p>	<p>Policy 6</p>	<p>DELETE Policy 6 AND REPLACE with the use of Farm Environment Plans to determine land use capabilities and nutrient allocation. AND MAKE any consequential amendments arising from the submission process.</p>	<p>Support in part</p>	<p>FFNZ agrees that Policy 6 should be deleted and replaced. FFNZ understands the submitter to oppose a blanket rule for land use change and seeks that land use change will be dealt with on a case by case basis through restrictions in Farm Environment Plans. FFNZ also opposes a blanket rule for land use change and seeks that land use change will be dealt with on a case by case basis.</p> <p>However, FFNZ does not agree with the use of land use capabilities and nutrient allocation in Farm Environment Plans as the means to do so. Rather, FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this as set out in FFNZ’s submission on Variation 1.</p>

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Graymont (NZ) Limited Submitter ID: 73954	PC1-2839	Policy 6	AMEND Policy 6 by ADDING at the end of the first paragraph the words: " <u>...Consideration will however be given to the net environmental result of the land use change and the ability of the change to assist in achieving the identified overall water quality standards.</u> Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted."	Oppose in part	FFNZ does not consider that the amendments proposed by the submitter will overcome the issues FFNZ has with the proposed policy. FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis. For these reasons, FFNZ opposes this submission point.
Greenplan Holdings Limited Submitter ID: 73893	PC1-2946	Policy 6	AMEND Policy 6 to allow for greater flexibility for landowners. AND AMEND to ensure that positive land use change that helps support and grow rural regions is encouraged. OR AMEND to provide compensation for land owners if Policy 6 is unchanged. AND MAKE any consequential amendments.	Support in part	FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters). FFNZ also agrees that provision on land use change should focus on more than just increase in diffuse discharge as the proposed Policy 6 does. FFNZ considers a number of relevant factors should be taken into account. How FFNZ proposes to change policy 6 is by the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis (see FFNZ's submission on Variation 1). FFNZ considers that increases in contaminants and land use change can appropriately be managed through the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>application of MPA, monitoring or reporting and management of the discharges.</p> <p>FFNZ would support an approach that considers the use of incentives and other public funds to provide compensation where there is a public good.</p>
Hamilton City Council Submitter ID: 74051	PC1-10262	Policy 6	AMEND Policy 6 to read: "Except as provided for in Policies 5a and 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted. Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted."	Support in part	<p>It is understandable that Hamilton City Council would want land use change to enable new urban development in Hamilton City. There are other submitters to Healthy Rivers that, like Hamilton City Council, also propose that not just increases in diffuse discharge should be taken into account when considering land use change.</p> <p>FFNZ agrees that urbanisation of land is a relevant factor that ought to be taken into account when land use change is considered however there are other factors that should be considered as well. Policy 6 needs to provide flexibility for land use change.</p> <p>How FFNZ proposes to change policy 6 is by adopting a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis (see FFNZ's submission on Variation 1).</p>
Hodgson, Andrew David Submitter ID: 74177	PC1-5591	Policy 6	AMEND Policy 6 so that if land is bought as dairy land at a dairy farm price but used as a drystock farm then it can still be able to be used or sold as a dairy farm	Support in part	FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			OR the landowners should be compensated.		greater flexibility (and subject to appropriate parameters). FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.
Horsley, Cam, Bridget, Rob and Tennille Submitter ID: 73412	PC1-6038	Policy 6	DELETE Policy 6. AMEND and RENOTIFY PPC1 when there are clear indications of what land use is required on the submitters farm including any consequential amendments.	Oppose in part	Although FFNZ agrees that Policy 6 should be deleted we do not consider that a Council should be prescribing the land use to people rather land use should be flexible and allow for changes as long as the effects of the activity are reasonable and managed.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10057	Policy 6	AMEND Policy 6 to read: "Except as provided for in Policy 16, land use change consent applications <u>under Rule 3.11.5.7</u> that demonstrate <u>on the balance</u> an increase in diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted. Land use change e Consent applications that demonstrate <u>on the balance</u> clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted."	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. For one it still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Huirimu Farms Ltd Submitter ID: 72582	PC1-5873	Policy 6	AMEND Policy 6 by providing a more tailored approach. AND AMEND by including land use change in the Farm Environment Plans and linked to land classification units and on a sub-catchment basis.	Support in part	FFNZ also seek a more tailored approach which also considers sub-catchment characteristics. However, FFNZ opposes the use of LUC to set contaminant limits or targets or to allocate contaminants or to allow or decline land use change.
Hurley, Peter James Submitter ID: 71391	C1-1122	Policy 6	ADD (Policy 6) policies and rules that manage effects that are based on the natural capital of soils and their productive potential rather than blanket rules based on existing land uses. AND ADD an exception to land use change restrictions for properties (including those below 40ha) where environmental effects are minimal or positive, such as improvements in biodiversity, sediment retention, phosphorus retention, economic efficiency and optimisation of natural resources). AND AMEND so that the restrictions and assessments of effects are not limited to the consideration of nitrogen discharges as modelled by the OVERSEER Model. AND DELETE the Nitrogen Reference Point (grandparenting) clauses and standards. AND AMEND so that the implementation of the rules are low cost and not impeded by bureaucracy.	Oppose in part	FFNZ agrees with the submitter to remove “blanket rules”. However, FFNZ opposes the use of LUC to set contaminant limits or targets or to allocate contaminants. FFNZ also opposes any mechanism to allocate based on natural capital of soils. FFNZ seeks the adoption of a new Policy 6 (see FFNZ’s submission on Variation 1) that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. FFNZ considers that in such a framework relevant factors could include improvements in biodiversity, sediment retention, phosphorus retention, amongst others. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents. FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND make and consequential amendments.		Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.
Jefferis, Daniel Submitter ID: 72989	PC1-6822	Policy 6	AMEND Policy 6 to give high priority water quality sub-catchments a Restricted Discretionary Activity status AND AMEND to give low priority water quality sub-catchments a Permitted Activity status AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.	Support in part	<p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change which does take into account the characteristics of the sub-catchment.</p> <p>FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.</p> <p>FFNZ does not understand what is meant by “appropriate mitigation strategies”. If this submission point is consistent with FFNZ’s proposed amendments to Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change, FFNZ agrees with the submitter.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Jivan Produce Ltd Submitter ID: 71429	PC1-1348	Policy 6	DELETE Policy 6. AND AMEND so that where a sub-catchment meets attribute targets set in Table 3.11-1 that change in land use should be enabled. AND where attribute targets cannot be met within the catchment ADD a NEW restricted discretionary activity to manage change in land use, whereby discretion is restricted to the mitigation of all four contaminants.	Support in part	FFNZ also seeks that proposed Policy 6 be deleted. FFNZ also agrees that characteristics of a sub catchment and whether or not it meets attribute targets are relevant factors when considering land use change. However FFNZ consider there are other relevant factors. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.
Kelton, Simon Douglas and Adrienne Judith Submitter ID: 73042	PC1-7861	Policy 6	DELETE Policy 6 in its entirety. If not deleted, then AMEND to provide for Land Use Capability to be used as a method of assessing land use, AND AMEND to provide for a property being sold to a neighbour to be farmed to the same intensity as that owned by purchaser.	Oppose in part	FFNZ also seeks that Policy 6 be deleted. However, FFNZ opposes the use of LUC to set contaminant limits or targets or to allocate contaminants or to allow or decline land use change.
Living Foods Ltd Submitter ID: 73758	PC1-5280	Policy 6	AMEND Policy 6 to provide for a restricted discretionary activity for operations capable of demonstrating clear and enduring decreases in existing diffuse discharges.	Oppose	FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					on a case by case basis. For these reasons, FFNZ opposes this submission point.
Logan, Andrea Jane Submitter ID: 73464	PC1-12257	Policy 6	AMEND PPC1 to give land use change in sub-catchments of high priority for water quality a restricted discretionary activity status and in low priority sub-catchments a permitted activity status AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND enable appropriate mitigation strategies through tailored Farm Environment Plans.	Support in part	<p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change which does take into account the characteristics of the sub-catchment.</p> <p>FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. FFNZ seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.</p> <p>FFNZ does not understand what is meant by “appropriate mitigation strategies”. If this submission point is consistent with FFNZ’s proposed amendments to Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change, FFNZ agrees with the submitter.</p>
Lowry, Karen and Peter Submitter ID: 73133	PC1-7979	Policy 6	DELETE Policy 6. OR AMEND to ensure Farm Environment Plans are used to determine land use capabilities which are matched with nutrient rights allocation based on an average/percentile per hectare basis.	Oppose in part	<p>FFNZ also seeks that Policy 6 be deleted. However, FFNZ opposes the use of LUC to set contaminant limits or targets or to allocate contaminants or to allow or decline land use change.</p> <p>In principle FFNZ does not oppose trading, however because trading first requires a N</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND to adopt a nutrient trading scheme based on an average/percentile per hectare basis regionally.		allocation FFNZ opposes trading in this instance. FFNZ is opposed to allocation of N on a property basis.
Lumsden, Malcolm John Submitter ID: 73454	PC1-2486	Policy 6	DELETE Rule 3.11.5.7 and REPLACE with a rule for land use change as a discretionary activity. (Policy 6)	Support	FFNZ also seeks that Rule 3.11.5.7 be replaced with a discretionary activity rule as set out in FFNZ's submission on Variation 1.
Mackenzie, David Stuart Submitter ID: 71695	PC1-3184	Policy 6	AMEND Policy 6, so that high priority water quality sub-catchments are a restricted discretionary activity. AND AMEND so that low priority water quality sub-catchments are a permitted activity. AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND so that appropriate mitigation strategies are adopted in the context of water quality gains through a tailored Farm Environment Plan.	Support in part	FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change which does take into account the characteristics of the sub-catchment. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents. FFNZ does not understand what is meant by "appropriate mitigation strategies". If this submission point is consistent with FFNZ's proposed amendments to Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change, FFNZ agrees with the submitter.
Macnab, Rob and Tina Submitter ID: 74150	PC1-8033	Policy 6	AMEND PPC1 so that land use is governed within the sub-catchment based on land use capability and natural capital	Support in part	FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ also supports a targeted approach that targets those

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND PPC1 so that if it fits within the parameters of the sub-catchments targets/goals then land use change should be consentable.		<p>sub-catchments with the worst water quality issues or the contaminant that is of greatest issue.</p> <p>FFNZ notes that the submitter promotes the adoption of Land Use Capability. FFNZ does not understand whether that means that the submitter seeks the allocation of nitrogen on the basis of LUC or the use of LUC as a decision support tool in preparing FEPs.</p> <p>Given the generality of the submission point FFNZ can only respond that it generally opposes Land Use Capability as an allocation method but reserves its position until it sees further particulars from the submitter.</p>
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9196	Policy 6	<p>AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted.</p> <p><u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u></p>	Oppose	<p>FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based.</p> <p>FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA,</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					monitoring or reporting and management of the other discharges.
Martyn, Anna Katrina Submitter ID: 72928	PC1-4158	Policy 6	AMEND Policy 6 to investigate the financial implications for each farm AND CONSIDER compensation.	Support	FFNZ consider Policy 6 will have large financial implications on farmers and accordingly agree that such implications should be carefully considered and form part of the discussion around policy 6. FFNZ would support an approach that considers the use of incentives and other public funds to provide compensation where there is a public good.
Masters, Stuart Bruce, Melvah Joy and Brendon James Submitter ID: 72445	PC1-3848	Policy 6	AMEND Policy 6 to ensure that Farm Environment Plans are a 'living' document and are able to be changed by consent and negotiation.	Support	FFNZ understands that the submitter seeks flexibility in the Farm Environment Plans. If so, FFNZ agrees and shares the submitter's concerns that as drafted, there is insufficient flexibility in the FEP framework. By its nature farming can be unpredictable and reactive. FFNZ submission on Variation 1 seeks flexibility for FEP through five steps which includes amongst others the ability to amend the FEP by a certified farm environment planner and the farming activity is to be undertaken generally (not absolutely) in accordance with the FEP.
Matahuru Farms Ltd Submitter ID: 73768	PC1-7002	Policy 6	REMOVE the blanket land use change restrictions of Policy 6 AND AMEND to include restricting land use change as an option in tailored sub-catchment plans when agreed by the relevant community, committee and council AND AMEND so that a resource consent may be required for some areas (e.g.	Support in part	FFNZ considers that getting the policy context right and allowing the assessment on a case by case basis of activities such as land use change is the appropriate means to address issues. For these reasons FFNZ agrees with the submitter to remove "blanket rules" and agrees that a tailored approach ought to be adopted. However, FFNZ is uncomfortable with the proposal of the submitter that land use change requires agreement from the "community,

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			where cropping or dairy conversion is being considered).		committee and council” because it is uncertain (for instance who is the committee and what do they consider). Rather FFNZ proposes (see FFNZ submission to variation 1) the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.
Matamata-Piako District Council Submitter ID: 73419	PC1-3494	Policy 6	DELETE the first sentence of Policy 6 and re-draft the remaining sentence to improve clarity and interpretation.	Oppose in part	<p>FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ’s concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based.</p> <p>FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ’s submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.</p>

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Maungatautari Marae Submitter ID: 73990	PC1-11735	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants.</u> "	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
McLaughlin, Robyn and Peter Submitter ID: 72984	PC1-10931	Policy 6	AMEND Policy 6 to allow land use change where the proposed farming system is on suitable land and within acceptable contaminant levels for that industry AND AMEND to give lower discharge farming systems security and flexibility in planning for the future.	Oppose in part	FFNZ agrees that Policy 6 needs to provide flexibility for land use change. FFNZ does not support Policy 6 or the submission point on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors.
Meier, Peter Submitter ID: 72622	PC1-9484	Policy 6	AMEND Policy 6 to ensure that all land use changes are permitted activities unless the land use change sits outside of the 75th percentile for Nitrogen Reference Points	Support in part	FFNZ agrees that Policy 6 needs to provide flexibility for land use change but FFNZ does not support making all land use changes permitted activities in the 75th percentile for Nitrogen Reference Points.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND to ensure Farm Environment Plans are the regulatory tool which enables (or not) land use change.		FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.
Mercury NZ Limited Submitter ID: 73182	PC1-9538	Policy 6	RETAIN Policy 6.	Oppose	FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis. For these reasons, FFNZ opposes this submission point.
Miraka Limited Submitter ID: 73492	PC1-8820	Policy 6	RETAIN Policy 6.	Oppose	FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis. For these reasons, FFNZ opposes this submission point.
Muir, Mark Submitter ID: 71422	PC1-6859	Policy 6	AMEND Policy 6 to supports land use change being a restricted discretionary activity for high priority water quality sub-	Support in part	FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			catchments and a permitted activity for low priority water quality sub-catchments. AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.		greater flexibility (and subject to appropriate parameters). FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.
Munro, David Malcolm and Lisa Ann Submitter ID: 71419	PC1-2030	Policy 6	AMEND Policy 6 to that high priority water quality sub-catchments have a Restricted Discretionary activity status. And low priority water quality sub-catchments have a Permitted activity status. AND AMEND to adopt a sub-catchment approach to ensure collaborative and fair management of resources within each sub-catchment. Then enable and adopt appropriate mitigation strategies in the context of water quality gains to be made through a tailored Farm Environment Plan.	Support in part	In principle FFNZ supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere). However, FFNZ does not consider priority sub catchments should be the only criteria for activity status for land use change. FFNZ agrees that mitigations and actions to improve water quality ought to be recognised and provided for. FFNZ agrees that a tailored approach ought to be adopted to recognise and provide for different farm systems and types.
Nelson Farms Partnership Submitter ID: 73054	PC1-8762	Policy 6	AMEND Policy 6 to include consideration of the amount of the proposed land use change discharges compared to existing discharges in the sub-catchment and consideration of the level of water quality	Support in part	FFNZ supports looking further than just the increase in diffuse discharge as assessment criteria for land use change. Similar to the submitter FFNZ supports, amongst others, considering the specific sub-catchment, progress

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			improvement needed in the sub-catchment . AND AMEND to include a base allowable discharge for the sub-catchment based on total discharges in the catchment and the level of improvement needed to meet short and long term targets.		towards and improvements still required to meet the target for each contaminant and the specific sector's contribution in the sub-catchment when considering land use change.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4618	Policy 6	RETAIN Policy 6 consent path for approval of land use applications that demonstrate clear and enduring decreases in existing diffuse discharges.	Oppose	FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis. For these reasons, FFNZ opposes this submission point.
Ngaati Tamaoho Trust Te Taiao Roopuu Submitter ID: 74088	PC1-11582	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u>	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11834	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants.</u> "	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Nicholson, Chris and Vikki Submitter ID: 72447	PC1-3930	Policy 6	AMEND Policy 6 to support land use change being a restricted discretionary activity for high priority water quality sub-catchments and a permitted activity for low priority sub-catchments. AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair	Support in part	FFNZ supports a sub-catchment management approach. FFNZ supports, amongst others, considering the specific sub-catchment, progress towards and improvements still required to meet the target for each contaminant and the specific sector's contribution in the sub-catchment when considering land use change.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>management of resources within each sub-catchment.</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains, through a tailored Farm Environment Plan.</p>		<p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change.</p> <p>FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.</p> <p>FFNZ does not understand what is meant by “appropriate mitigation strategies”. If this submission point is consistent with FFNZ’s proposed amendments to Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change, FFNZ agrees with the submitter.</p>
<p>Oji Fibre Solutions (NZ) Limited Submitter ID: 73725</p>	<p>PC1-6404</p>	<p>Policy 6</p>	<p>DELETE Policy 6. AND AMEND Policy 2 to incorporate a requirement for new farming activities to adopt Best Practicable Options from the outset.</p>	<p>Support in part</p>	<p>FFNZ agrees that Policy 6 ought to be deleted but considers some framework or guidance need to be provided for land use change. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis.</p> <p>FFNZ’s submission on Variation 1 sought adoption of Most Practicable Actions (MPA) for diffuse discharge and BPO for point source discharge.</p>

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Osborne, Bob, Judy, Kim and Janette Submitter ID: 73249	PC1-9394	Policy 6	AMEND Policy 6 to include consideration of the numerical values of the proposed discharges (from the land use change) compared to existing discharges in the sub-catchment AND AMEND to provide consideration to the level of water quality improvement needed in the sub-catchment AND AMEND to provide a base allowable discharge for the sub-catchment, based on total discharges in the catchment and the level of water quality improvement needed to meet the short term and 80 year targets.	Support in part	<p>FFNZ supports a sub-catchment management approach. FFNZ supports, amongst others, considering the specific sub-catchment, progress towards and improvements still required to meet the target for each contaminant and the specific sector's contribution in the sub-catchment when considering land use change.</p> <p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change.</p> <p>FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.</p>
Pamu Farms of New Zealand Submitter ID: 74000	PC1-6000	Policy 6	AMEND Policy 6 so that nitrogen loss is subject to Best Practicable Option analysis or include emphasis on the stocking rate as the highest determinant of modelled nitrogen loss.	Oppose in part	<p>Proposed Policy 6 concerns land use change. FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. Accordingly FFNZ also oppose any amendments that solely focuses on nitrogen loss (whether subject to BPO or through emphasis on stocking rates).</p> <p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					case basis. For these reasons, FFNZ opposes this submission point.
Peacocke, Matthew Anthony Submitter ID: 73058	PC1-1904	Policy 6	AMEND Policy 6 so that all farm land has the same ability to change land use provided the environmental impacts can be effectively managed. AND AMEND Rule 3.11.5.7 from a non-complying activity to a discretionary activity.	Support	FFNZ agrees that Policy 6 needs to provide flexibility for land use change. FFNZ also seeks that Rule 3.11.5.7 be replaced with a discretionary activity rule as set out in FFNZ's submission on Variation 1. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Peterson and Carswell, Lance Colin and Sarah Submitter ID: 73899	PC1-5111	Policy 6	AMEND Policy 6 so land use change should be included in the Farm Environment Plans and land classification on a sub-catchment basis. AND AMEND Policy 6 to a policy that covers the whole of Waikato and Waipā River catchments and applies to all land equally. AND AMEND PPC1 to be tailored to be each farm, as all are run in a different way.	Support	FFNZ agrees that Policy 6 needs to provide flexibility for land use change and should recognise different characteristics of sub catchments. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters). FFNZ also agrees that a tailored approach ought to be adopted to recognise and provide for different farm systems and types. FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					effects of such activities as set out in FFNZ's submission on Variation 1.
Pinnell, Graham Submitter ID: 74007	PC1-4396	Policy 6	AMEND (Policy 6) Policy 3 and Rule 3.11.5.5(f) and (g) so that the area of commercial vegetable production for those species that are only grown for the domestic market is not capped. AND AMEND Rule 3.11.5.7 to shorten the sunset date to 1 July 2021 AND AMEND to clarify that the last sentence under the Notification heading that it applies to resource consent conditions only AND AMEND to clarify that off-site mitigation in the same sub-catchment is permissible to off-set the assessed increase in contaminant discharge from land use intensification.	Support in part	<p>FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production (see proposed amendments to Policy 2 and 3 in FFNZ's submission on Variation1). Similar to the submitter, FFNZ opposes a cap on the maximum area for vegetable production as FFNZ recognises the importance of vegetable production to the people of New Zealand as a whole although FFNZ differs from the submitter as FFNZ does not differentiate between vegetables for domestic market and other markets.</p> <p>FFNZ opposes limiting the term of the consent under Rule 3.11.5.7 so it will also oppose shortening that date. FFNZ considers the proposed "sunset date" already does not recognise the significant investment that is likely to be involved with land use change.</p> <p>Unlike the submitter, FFNZ does not consider the last sentence of the notification paragraph of Rule 3.11.5.7 can relate to resource consent condition as it is about notification. FFNZ seeks that the last sentence be deleted.</p> <p>FFNZ agrees that mitigations and actions to improve water quality ought to be recognised and provided for.</p>
Poohara Marae Submitter ID: 73545	PC1-12009	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted.	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted.</p> <p><u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u></p>		<p>criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based.</p> <p>FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.</p>
Potini Whaanau Submitter ID: 74089	PC1-11685	Policy 6	<p>AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted.</p> <p><u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u></p>	Oppose	<p>FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based.</p> <p>FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA,</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					monitoring or reporting and management of the other discharges.
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7788	Policy 6	AMEND Policy 6 to enable flexibility in land use change for commercial vegetable production systems.	Support	FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production (see proposed amendments to Policy 2 and 3 in FFNZ's submission on Variation1). FFNZ recognises the importance of vegetable production to the people of New Zealand. FFNZ agrees that Policy 6 needs to provide flexibility for land use change but not just for commercial vegetable growers. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters).
Purdie, Les and Helen Submitter ID: 71291	PC1-5910	Policy 6	AMEND Policy 6 timeframes for stock exclusion. AND CONSIDER the health and safety impact of overhead wires needed to supply electricity to fences.	Support	FFNZ agrees that the stock exclusion provisions should be improved. FFNZ in its submission on variation 1 seeks stock exclusion provisions that are affordable, practical and sustainable. FFNZ recommends improvements to Schedule C which are broadly: <ul style="list-style-type: none"> - Linking the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses the issue.
Purdie, Robert James Submitter ID: 74133	PC1-10034	Policy 6	AMEND Policy 6 to focus on restricting stocking rates that suit the land type and terrain AND AMEND to include restrictions on the use of fertilisers especially nitrogen.	Oppose in part	FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					other relevant factors. Similar stocking rates and restrictions of fertilisers are still inflexible and focussing on diffuse discharge (rather than managing the effects). Accordingly, FFNZ opposes the submission point.
Ratray, Earl Steven Submitter ID: 73528	PC1-6958	Policy 6	AMEND Policy 6 to read as follows: <u>"Land use changes will be permitted between dairy and drystock and back to dairy again where the change is made by the same farming entity on the same land area and where diffuse discharge of nitrogen, phosphorous, sediment or microbial pathogens will be no greater than the reference point when the property was last farmed as a dairy farm."</u>	Oppose in part	FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters). FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10553	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u>	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Ravensdown Limited Submitter ID: 74058	PC1-10107	Policy 6	AMEND Policy 6 as follows: "Except as provided for in Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens <u>which will potentially result in deterioration of water quality</u> will general not be granted. Land use change consent applications that demonstrate clear and enduring decreases <u>an increase</u> in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens <u>which does not result in deterioration of water quality, or an overall decrease</u> will generally be granted."	Oppose	FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis. For these reasons, FFNZ opposes this submission point.
Roberts, Jessica Submitter ID: 74141	PC1-7168	Policy 6	AMEND PPC1 to state high-priority sub-catchments in relation to water quality are a restricted discretionary activity, or permitted activity if in a low priority catchment AND AMEND to adopt a sub-catchment management approach AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plans.	Support in part	FFNZ considers that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ supports a sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere). FFNZ also seeks a new Policy 6 to provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.

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Rotorua Lakes Council Submitter ID: 73373	PC1-2504	Policy 6	AMEND Policy 6 so the first sentence reads as: <u>"Except as provided for in Policies X, 10, 11, 12 and 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens, will generally not be granted."</u> AND MAKE any consequential amendments.	Oppose	FFNZ opposes the submission point on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors.
Shabor Ltd Submitter ID: 71400	PC1-1108	Policy 6	DELETE Policy 6 provisions that restrict land use change in its entirety. AND CONSIDER Land Use Capability or natural capital approach as a method of assessing land use.	Support in part	FFNZ also seeks that Policy 6 be deleted but unlike the submitter FFNZ seeks it to be replaced with a framework for assessing land use change on a case by case basis. FFNZ notes that the submitter promotes the adoption of Land Use Capability. FFNZ does not understand whether that means that the submitter seeks the allocation of nitrogen on the basis of LUC or the use of LUC as a decision support tool in preparing FEPs. Given the generality of the submission point FFNZ can only respond that it generally opposes Land Use Capability as an allocation method but reserves it position until it sees further particulars from the submitter.
Shaw and Hall, Leigh Michael and Bradley John Submitter ID: 73858	PC1-2617	Policy 6	AMEND Policy 6 so that land use change in high priority sub-catchments is a Restricted Discretionary Activity AND AMEND Policy 6 so that land use change in a low priority sub-catchment is a Permitted Activity AND ADOPT a sub-catchment management approach in PPC1 to ensure collaborative and fair management of resources within each sub-catchment	Support in part	FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change which does take into account the characteristics of the sub-catchment. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND to enable appropriate mitigation strategies to be adopted through a tailored Farm Environment Plan.		discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents. FFNZ does not understand what is meant by “appropriate mitigation strategies”. If this submission point is consistent with FFNZ’s proposed amendments to Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change, FFNZ agrees with the submitter.
Smith, Barrie Allan and Gwyneth Monica Submitter ID: 71420	PC1-1254	Policy 6	AMEND Policy 6 to change the activity status of land use change from non-complying activity to a permitted activity. AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan.	Support in part	FFNZ agrees that Policy 6 needs to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters). However FFNZ still considers that there ought to be some control over land use change. FFNZ seeks that Rule 3.11.5.7 be replaced from a non-complying activity to a discretionary activity rule as set out in FFNZ’s submission on Variation 1 and adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11102	Policy 6	AMEND Policy 6 to read: "Except as provided for in Policy 16, <u>Policy [X1]</u> , land use change consent applications..." AND ADD a NEW policy that reads: " <u>Policy [X1] - Flexibility for land use change</u> <u>Land use change consent applications for activities that will not result in an</u>	Oppose	FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. The submission point does not address FFNZ’s concerns with policy 6. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>increased diffuse discharge or nitrogen, phosphorus, sediment and microbial pathogens across a property or enterprise will generally be granted, taking into account:</u></p> <p><u>i. Commitment to the implementation of Best Management Practice actions for nitrogen, phosphorus, sediment and microbial pathogens for the proposed land use, including through the use of Farm Environment Plans for each property or enterprise;</u></p> <p><u>ii. The creation of positive economic, social and cultural benefits for the Waikato Region."</u></p>		assessment of applications for increases in contaminants and land use change on a case by case basis. For these reasons, FFNZ opposes this submission point.
South Waikato District Council Submitter ID: 72892	PC1-4042	Policy 6	DELETE the first sentence of Policy 6. AND AMEND the remaining sentence to clarify what is meant by '...demonstrate clear and enduring decreases in existing diffuse discharges.'	Support in part	<p>FFNZ agrees that Policy 6 should focus on a framework for assessing possible land use change. However Policy 6 still solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors.</p> <p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis.</p>
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11783	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics,

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			<p>microbial pathogens will generally be granted.</p> <p><u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u></p>		<p>proportionality and other relevant factors. This is inflexible and not effects based.</p> <p>FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.</p>
<p>Te Awamaarahi Marae Trustees Submitter ID: 74168</p>	<p>PC1-11971</p>	<p>Policy 6</p>	<p>AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring<u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted.</p> <p><u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u></p>	<p>Oppose</p>	<p>FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based.</p> <p>FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.</p>

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Te Kauri Marae Submitter ID: 74124	PC1-11632	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants.</u> "	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Te Runanga o Ngati Kea Ngati Tuara Trust Submitter ID: 73543	PC1-12243	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary</u>	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u>		variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Te Taniwha o Waikato Submitter ID: 73361	PC1-12059	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u>	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Te Whakakitenga o Waikato Incorporated (Waikato-Tainui) Submitter ID: 74105	PC1-7848	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics,

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			microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u>		proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8258	Policy 6	AMEND Policy 6 to read: "Except as provided for in Policy 16,1 Land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted only be [granted] in exceptional circumstances. Land use change consent applications that demonstrate clear and enduring provide for decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens <u>that will ensure that the water quality targets set out in Table [3].11-1</u> will generally be granted."	Oppose	FFNZ does not support the submission point on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. It creates a regime that is inflexible and not effects based. Rather FFNZ seeks the adoption of a new policy 6 that provides an appropriate framework for the assessment of applications for increase in contaminants and land use change.
Treweek, Glen Submitter ID: 72747	PC1-5778	Policy 6	AMEND Policy 6 to read: "Policy 6: Restricting land use change/translation <u>With regard to the sensitivity of the receiving water body to each of the</u>	Oppose in part	FFNZ agrees that the receiving water body and the sub-catchment needs to be considered. FFNZ supports, amongst others, considering the specific sub-catchment, progress towards and

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			<p><u>diffuse contaminants, nitrogen, phosphorus, sediment or microbial pathogens, and except</u> Except as provided in Policy 16...</p> <p>Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted.</p> <p><u>Land use change consent applications that demonstrate an increase in a particular diffuse contaminant (nitrogen, phosphorus, sediment or microbial pathogens), will generally be granted if the receiving water body has capacity to accept that contaminant, or if the proposed land use change application is for a low-level contaminant discharge activity and substantial headroom has been created by reductions made by moderate to high discharge contaminant activities in the same sub-catchment or catchment."</u></p>		<p>improvements still required to meet the target for each contaminant and the specific sector's contribution in the sub-catchment when considering land use change.</p> <p>However FFNZ opposes the submission point as it solely focuses on increases in diffuse discharge. FFNZ does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change on a case by case basis.</p>
Turangawaewae Marae Submitter ID: 74173	PC1-12181	Policy 6	<p>AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will <u>generally</u> not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted.</p> <p><u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the</u></p>	Oppose	<p>FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based.</p> <p>FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is</p>

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			<u>four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u>		assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10297	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u>	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Twining, Murray Ian and Robyn Joy Submitter ID: 72587	PC1-6786	Policy 6	AMEND Policy 6 to support land use change being a restricted discretionary activity for high priority water quality sub-catchments and a permitted activity for low priority water quality sub-catchments.	Support in part	FFNZ supports a sub-catchment management approach. FFNZ supports, amongst others, considering the specific sub-catchment, progress towards and improvements still required to meet the target for each contaminant and the specific

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			<p>AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.</p>		<p>sector's contribution in the sub-catchment when considering land use change.</p> <p>FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change.</p> <p>FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.</p> <p>FFNZ does not understand what is meant by "appropriate mitigation strategies". If this submission point is consistent with FFNZ's proposed amendments to Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change, FFNZ agrees with the submitter.</p>
Verkerk, Gwyneth Submitter ID: 60476	PC1-1281	Policy 6	AMEND Policy 6 to allow greater flexibility for horticulture producers to utilise small parcels of land across the region within their farm rotation systems, provided their purpose is for fruit and vegetable production for the New Zealand market.	Support in part	<p>FFNZ supports a tailored approach to managing diffuse discharges from commercial vegetable production (see proposed amendments to Policy 2 and 3 in FFNZ's submission on Variation1). FFNZ recognises the importance of vegetable production to the wellbeing of the people of New Zealand.</p> <p>FFNZ agrees that Policy 6 needs to provide flexibility for land use change but not just for fruit and vegetable production. In principle, FFNZ supports any amendments which seek to provide</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					greater flexibility (and subject to appropriate parameters).
Waahi Pa Marae Committee Submitter ID: 73751	PC1-12120	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u>	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Waahi Whaanui Trust Submitter ID: 73537	PC1-11959	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted. Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the</u>	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is

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			<u>four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u>		assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Waikato and Waipa Branches of the New Zealand Deer Farmers Association Submitter ID: 74008	PC1-9473	Policy 6	AMEND Policy 6 to enable land use activities, including changes in land use, where increases in contaminant discharges still enable sub-catchment outcomes for water quality to be met AND AMEND to ensure changes in land use occur within the sustainable level for a sub-catchment AND ENSURE the degree to which land use is optimised in relation to the natural capital of soils and sub-catchment water quality 80 year attributes targets is taken into account AND AMEND to provide for increases in nitrogen discharge where land use change will result in overall improvement in sustainable management and decreases in soil loss, phosphorus loss, management of microbial pathogens and enhancement of biodiversity.	Support in part	FFNZ supports a sub-catchment management approach. When considering land use change, FFNZ supports an approach that will, amongst others, considering the specific sub-catchment, progress towards and improvements still required to meet the target for each contaminant and the specific sector's contribution in the sub-catchment. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the assessment of applications for increases in contaminants and land use change. FFNZ considers that increases in contaminants and land use change can appropriately be managed through the application of MPA, monitoring or reporting and management of the discharges. It seeks a new Policy 6 to reflect this and provide support and guidance for restricted discretionary and proposed discretionary (for land use change) consents.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3315	Policy 6	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will generally not be granted.	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			Land use change consent... that demonstrate clear and enduring <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u>		declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Waikato Dairy Leaders Group Submitter ID: 74049	PC1-11011	Policy 6	RETAIN Policy 6 guidance for Non-Complying consent applications to increase discharges leaving a property.	Oppose	The combination of proposed Policy 6 and the non-complying activity rule is that land use change that increases any contaminant will be prohibited. For the proposed regime it is irrelevant whether the activity and sub-catchment has minimal discharge levels or whether the contaminant that the activity will increase is not an issue in the sub-catchment. Any increase in any contaminant will be prohibited regardless of the sub-catchment situation. FFNZ considers that this is unreasonable, inflexible and does not achieve sustainable management and neither is it effects based.
Waikato Focus on Peat Group Submitter ID: 72148	PC1-5519	Policy 6	AMEND Policy 6 to determine land use by the attributes of the land.	Oppose	FFNZ considers the attributes of the land is a helpful decision support tool in the toolbox when preparing FEPs. However FFNZ opposes Land Use Capability as an allocation method or as criteria for land use change.

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Waikato Regional Council Submitter ID: 72890	PC1-3005	Policy 6	AMEND Policy 6 to read: "Except as provided for in Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens <u>compared with what was occurring at 22 October 2016</u> , will generally not be granted. Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>compared with what was occurring at 22 October 2016</u> , will generally be granted."	Oppose	FFNZ does not consider that the amendments as proposed by the submitter resolves FFNZ's concerns with proposed Policy 6. It still solely focuses on increases in diffuse discharges as criteria for land use change (and propose declining consent) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. This is inflexible and not effects based. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges.
Waipa District Council Submitter ID: 67704	PC1-3160	Policy 6	AMEND Policy 6 so that the first sentence reads as follows: "Except as provided for in Policy <u>Policies 10, 11, 12 and 16</u> , land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens, will generally not be granted."	Oppose in part	FFNZ understands that the submitter seeks exceptions from proposed Policy 6 to temper its inflexibility. FFNZ agrees that proposed Policy 6 needs to be improved to provide flexibility for land use change. In principle, FFNZ supports any amendments which seek to provide greater flexibility (and subject to appropriate parameters) but not just for activities captured by Policies 10, 11 and 12. FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					effects of such activities as set out in FFNZ's submission on Variation 1.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11346	Policy 6	<p>AMEND Policy 6 to read:</p> <p><u>"a. Except as provided for in Policy 16...</u></p> <p><u>b. Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges or nitrogen, phosphorus, sediment or microbial pathogens how the freshwater objectives in Objective 3 and Table 3.11 - 1 can be achieved will generally be granted.</u></p> <p><u>c. Sub-catchment land use change consent applications will generally be granted where:</u></p> <p><u>i. It is made by an enterprise for properties in a sub-catchment following a collaborative process to seek participation from all stakeholders with an interest in the land area in any sub-catchment.</u></p> <p><u>ii. It is supported by an adaptive management and mitigation approach for the sub-catchment which determines the suitability of the land for development including the risk of contaminant discharges from that land and the sensitivity of the receiving water bodies.</u></p> <p><u>iii. The enterprise has prepared a Sub-catchment Management Plan in accordance with the criteria set out in [new] Schedule 2 of Chapter 3.11 with actions which demonstrate how the enterprise will achieve Objective 3 and</u></p>	Support in part, oppose in part	<p>FFNZ opposes the submitter's proposed amendments at a. because it still generally declines land use change solely on increases in diffuse discharges from any contaminant without considering other relevant factors.</p> <p>In principle FFNZ supports the submitter's proposed amendments at b. as it is effects based and allows land use change within the set parameters.</p> <p>FFNZ is not sure what is meant by "sub-catchment land use change" at c. but can state that in generally FFNZ supports a sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. While FFNZ supports non-regulatory sub-catchment planning and groups, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>Further FFNZ is uncertain about the hierarchy between a., b. and c (ie when will an application be considered to be under a., b. or c).</p>

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			<u>specifically the Table 3.11-1 freshwater objectives."</u>		
Wai Shing Ltd Submitter ID: 73069	PC1-2268	Policy 6	AMEND Policy 6/PPC1 to provide for a restricted discretionary activity for operations capable of demonstrating clear and enduring decreases in existing diffuse discharges.	Oppose in part	FFNZ agrees that the proposed plan does not provide a consenting pathway for increases in contaminants and it is likely to be very difficult to obtain a restricted discretionary activity consent and impossible to obtain a consent for land use change (unless the applicant can demonstrate that all contaminants will reduce). FFNZ seeks a new Policy 6 (see FFNZ's submissions on Variation 1) to provide support and guidance for the restricted discretionary and proposed discretionary (for land use change) consents. However FFNZ's suggested pathway does not focused on just diffuse discharge but also take into account particular sub-catchment characteristics, proportionality and other relevant factors.
Waitomo Catchment Trust Board Submitter ID: 73124	PC1-7950	Policy 6	DELETE Policy 6 AND AMEND to provide for land use change in Farm Environment Plans AND AMEND to ensure that low dischargers can increase production to offset rising costs AND AMEND to ensure that properties where mitigation is already in place are taken into account when applying for resource consent.	Oppose in part	FFNZ agrees that Policy 6 needs to provide flexibility for land use change. FFNZ is uncertain about the particulars and mechanics to provide for land use change in Farm Environment Plans as the submitter proposed and reserves it position once the particulars are provided. FFNZ also does not support Policy 6 on the basis that it solely focuses on increases in diffuse discharges (and declining consent for such activities) without consideration of particular sub-catchment characteristics, proportionality and other relevant factors. FFNZ does not agree with a Policy 6 that solely assesses land change on increases in diffuse. FFNZ seeks the adoption of a new Policy 6 that provides an appropriate framework for the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					assessment of applications for increases in contaminants and land use change on a case by case basis. For these reasons, FFNZ opposes this submission point.
Waitomo District Council Submitter ID: 73688	PC1-10317	Policy 6	AMEND Policy 6 so that the relationship between Policy and Rule 3.11.5.7 is clear AND AMEND Policy 6 (and other policies as required) so as to clearly differentiate between rural and urban land use and diffuse and point source discharges AND AMEND to address the policy disconnect between Policies 10 to 12 and Policy 6 [Policies 10 to 12 assume that certain discharges can have an adverse effect to a point and may increase, but Policy 6 does not make the same allowance].	Support in part	FFNZ considers that the combination of proposed Policy 6 and the non-complying activity rule (Rule 3.11.5.7) is that land use change that increases any contaminant will effectively be prohibited. FFNZ's submission to Variation 1 seeks that Rule 3.11.5.7 be replaced with a discretionary activity rule. FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted under Rule 3.11.5.6 and Rule 3.11.5.7 that can demonstrate appropriate management of the discharge of contaminants through the application of MPA, monitoring or reporting and management of the other discharges. FFNZ opposes differing in approach between urban and rural; point source and diffuse discharge. FFNZ is not suggesting that the exact same provisions are adopted for all discharges but is seeking changes so that diffuse and point source discharges are treated equally and proportionally. In principle, FFNZ supports any amendments which seek to provide greater flexibility for land use change (and subject to appropriate parameters) but not just for activities captured by Policies 10, 11 and 12.

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					FFNZ considers that a more appropriate way to deal with the flexibility required for things like nitrogen increases and land use change is to delete Policy 6 and instead insert a new Policy 6 which focuses on reasonably managing the effects of such activities as set out in FFNZ's submission on Variation 1
Ward, Bruce Submitter ID: 73286	PC1-7282	Policy 6	AMEND Policy 6 so each property has its own Nitrogen Reference Point.	Oppose in part	FFNZ does not have a problem with nitrogen reference point as long as it is not used as benchmark, grandparenting of N or to allocate N. FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters. FFNZ is not sure how the NRP relief sought by the submitter relates to land use change. To the extent that it aligns with FFNZ's submissions on Plan Change 1 and Variation 1, it supports it. However, to the extent that it is inconsistent with that submission and/or solely focuses on increase in diffuse discharge without consideration of particular sub-catchment characteristics, proportionality and other relevant factors, FFNZ opposes it.
Wilcox, Alexander Greer and Glen Andrew Submitter ID: 73026	PC1-6904	Policy 6	AMEND Policy 6 to support land use change being a restricted discretionary activity for high priority water quality sub-catchments and a permitted activity for low priority water quality sub-catchments. AND AMEND PPC1 to adopt a sub-catchment management approach to	Support in part	In principle FFNZ supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere). However, FFNZ does not consider priority sub catchments should be the only criteria for activity status for land use change.

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			<p>ensure collaborative and fair management of resources within each sub-catchment.</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.</p>		<p>FFNZ agrees that mitigations and actions to improve water quality ought to be recognised and provided for.</p> <p>FFNZ agrees that a tailored approach ought to be adopted to recognise and provide for different farm systems and types.</p>
<p>Wildman, Anna Mary Submitter ID: 72505</p>	<p>PC1-3893</p>	<p>Policy 6</p>	<p>DELETE Policy 6 AND REPLACE with provisions for land use changes to be controlled and managed through a Farm Environment Plan to ensure best practice in mitigating contaminant loss and other factors affecting waterways.</p> <p>AND AMEND so that the consent process is not just subject to whether the Nitrogen Reference Point will increase as nitrate losses.</p> <p>AND DELETE the Nitrogen Reference Point AND REPLACE with the use of Farm Environment Plans as the primary tool to manage nutrient losses in line with the sub-catchment approach. Nitrogen Reference Points should be used to support the Farm Environment Plans and farms with high emission should still be required to reduce their nutrient losses.</p> <p>AND more work should be done on addressing contaminant loss through a sub-catchment approach including increased use of technology and water monitoring to support the identification of sub-catchment issues.</p>	<p>Support</p>	<p>FFNZ proposes adopting a new Policy 6 with a possible pathway to grant consent for an increase in contaminants and land use change that is assessed on a case by case basis according to the framework set out in FFNZ's submissions on variation 1. In essence the framework proposes that consent can be granted that can demonstrate appropriate management of the discharge of contaminants through the application of Most Practicable Action, monitoring or reporting and management of the other discharges. This is very similar to what the submitter is seeking.</p> <p>FFNZ like the submitter also oppose the Nitrogen Reference point, but if it is to be used as benchmark, grandparenting of N or to allocate N. FFNZ considers that it be used simply to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.</p> <p>FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis.</p>

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Williams, Ian David Submitter ID: 71432	PC1-763	Policy 6	DELETE Rule 3.11.5.7 (Policy 6) AND REPLACE Rule 3.11.5.7 with a rule that enables land use change to occur with reference to established sub-catchment limits. AND ADD a provision to make Land-use change for farming activities with contaminant losses below the catchment limit a permitted activity so long as contaminant losses do not exceed the sub-catchment limit. AND ADD a provision to make Land-use changes for farming activities with contaminant losses above the sub-catchment limit a consented activity.	Support in part	FFNZ also considers that the combination of proposed Policy 6 and the non-complying activity rule (Rule 3.11.5.7) is that land use change that increases any contaminant will effectively be prohibited. FFNZ's submission to Variation 1 seeks that Rule 3.11.5.7 be replaced with a discretionary activity rule which allows land use change within parameters. FFNZ also agrees that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. However FFNZ considers that land use change ought to focus on more than solely increase in diffuse discharge and also consider factors like sub-catchment characteristics, proportionality and other relevant factors.
Williamson, Terry Submitter ID: 71228	PC1-777	Policy 6	DELETE from Policy 6 the exception, as provided for by reference to Policy 16.	Support	FFNZ supports a reasonable consenting regime that is effects based as opposed to ownership based.
Woodacre Partnership Submitter ID: 67313	PC1-4221	Policy 6	AMEND PPC1 to provide a Restricted Discretionary activity status for high priority sub-catchments and a Permitted activity status for low priority sub-catchments (in relation to water quality) AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND by enabling appropriate water quality mitigation strategies to be adopted through tailored Farm Environment Plans.	Support in part	In principle FFNZ supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere). However, FFNZ does not consider priority sub catchments should be the only criteria for activity status for land use change. FFNZ agrees that mitigations and actions to improve water quality ought to be recognised and provided for.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					FFNZ agrees that a tailored approach ought to be adopted to recognise and provide for different farm systems and types.
Yule, Don, Lauris and Yvette Submitter ID: 73096	PC1-11533	Policy 6	AMEND PPC1 to give land use change in sub-catchments of high priority for water quality a restricted discretionary activity status and in low priority sub-catchments a permitted activity status AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment, and enable appropriate mitigation strategies through tailored Farm Environment Plans.	Support in part	In principle FFNZ supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere). However, FFNZ does not consider priority sub catchments should be the only criteria for activity status for land use change. FFNZ agrees that mitigations and actions to improve water quality ought to be recognised and provided for. FFNZ agrees that a tailored approach ought to be adopted to recognise and provide for different farm systems and types.
Alcock, Carl and Jo Submitter ID: 73376	PC1-2181	Policy 7	AMEND Policy 7 by removing the Nitrogen Reference Point and use of the OVERSEER Model AND AMEND by adopting a sub-catchment approach to addressing contaminants relevant to each sub-catchment AND AMEND by removing a blanket restriction of one nutrient that may not even be relevant for that sub-catchment AND AMEND by using Farm Environment Plans to determine what is best for each farm and science to	Support in part Oppose in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>determine what contaminants are an issue in each sub-catchment AND DELETE the Nitrogen Reference Point and Overseer from all other areas in PPC1 AND MAKE any other consequential amendments.</p>		<p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. For these reasons FFNZ agrees with the parts of the submission point that relate to removing a blanket restriction on nutrients that may not be an issue for the relevant sub-catchment.</p>
<p>Alcock and Easton, Jo and John Submitter ID: 73374</p>	<p>PC1-9228</p>	<p>Policy 7</p>	<p>DELETE Policy 7 provisions relating to the Nitrogen Reference Point in their entirety AND DELETE provisions relating to the OVERSEER Model in their entirety AND AMEND to adopt a sub-catchment approach to addressing contaminants that are relevant to each sub-catchment AND AMEND to ensure there is no blanket restriction of one nutrient that may not even be relevant for a sub-catchment AND AMEND to use Farm Environment Plans to determine what would work best on each farm</p>	<p>Support in part Oppose in part</p>	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND to use science to determine which contaminants are an issue in each sub-catchment		<p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. For these reasons FFNZ agrees with the parts of the submission point that relate to removing a blanket restriction on nutrients that may not be an issue for the relevant sub-catchment.</p> <p>FFNZ also agrees that robust science is required and information gaps ought to be addressed. For this reason FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched.</p>
Anderson, Graham Harold Submitter ID: 73978	PC1-4515	Policy 7	AMEND to ensure mitigation put in place under PPC1 will not be undermined by future plan changes.	Support	FFNZ agrees that any investments in nitrogen (or any other contaminate) mitigation ought to be recognised in future plan changes. FFNZ notes that this could also appropriately incentivise actions in the next 10 years to improve water quality.
Anderson, Jack L and Ann A	PC1-4250	Policy 7	DELETE Nitrogen Reference Point. Policy 7	Support in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73085			AND AMEND to deal with on farm problems. AND AMEND to include a plan of what there would be in 25 to 80 years.	Oppose in part	<p>FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. For these reasons FFNZ does not agree with this submission point.</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. It is not clear what the submitter means by “deal with on farm problems” but FFNZ considers that on farm problems ought to be addressed through the FEP and MPA framework as set out in its submission on Variation 1.</p> <p>On the basis of current information FFNZ considers that it is not appropriate to determine 25-80-year numeric attribute states. As set out in FFNZ’s submission on Variation 1, FFNZ has significant concerns about the assumptions that underpin the 80 year targets and FFNZ advocates for a narrative approach to achieve the values and Vision Strategy. FFNZ has concerns about the potential economic, social and cultural implications if a plan was detailed for where we would be in 25 to 80 years and also considers there is insufficient certainty around appropriate water quality targets and potential mitigations to do this (particularly when, over time, science will improve, our understanding of water quality will improve and technology will change). For these</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					reasons FFNZ does not agree with this submission point.
Aston, Lucy Submitter ID: 73020	PC1-7127	Policy 7	<p>DELETE the Nitrogen Reference Point requirements from PPC1. AND, if the Nitrogen Reference Point requirements are not deleted, AMEND PPC1 so that the OVERSEER Model is not solely relied on but is used as part of a range of measurement tools AND AMEND PPC1 so that where Overseer is used that the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters AND REMOVE the requirement for operations at or under 18 stock units, and sheep and beef farmers to have to manage to a Nitrogen Reference Point AND AMEND PPC1 to adopt a sub-catchment approach to addressing contaminants that are relevant to each farm and water body AND AMEND PPC1 so that where nitrogen discharges from a property have to be allocated then the allocation system is based on the natural capital of soils and the water quality outcomes that are to be achieved for each sub-catchment, not on the 2014/15 or 2015/16 land use or grandparenting approach AND AMEND PPC1 so that Farm Environment Plans are used to determine what would work best on each farm.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number.</p> <p>FFNZ agrees with the submitter's proposal that there ought to be the ability to use models other than Overseer to estimate nitrogen where Overseer is not appropriate (e.g. there are mitigations that Overseer does not recognise) or changes to Overseer input standards. In its submission on Variation 1, FFNZ has proposed changes to the Schedules to provide for this.</p> <p>FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. For these reasons FFNZ does not agree with the submitter's request to delete the NRP but agrees about the use of Overseer.</p> <p>FFNZ disagrees with the submitter's point that those farms under 18 stock units should not have to obtain an NRP but only on the basis that the amendments it has proposed in its submission on Variation 1 are adopted i.e. flexibility is provided (particularly for those below a permitted baseline) to increase nitrogen in appropriate circumstances</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>(and an appropriate consenting pathway is available).</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. Similarly, FFNZ does not support the allocation of contaminants and considers that flexibility needs to be provided for land use change or intensification of activities or changes to farm systems where appropriate (and as provided for in the amendments attached to its submission on Variation 1).</p> <p>FFNZ does not agree with the submitter that nitrogen should be calculated on the basis of the natural capital of soils. FFNZ does not support nitrogen allocation. FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils.</p> <p>FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen (and if LUC is not used, there is no other reasonable proxy), there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. In terms of the NRP, FFNZ considers that the period for the benchmarking years needs to be changed and that there needs to be a reasonable pathway to increase nitrogen in appropriate circumstances. With these changes it would not be an allocation approach and would not be grand parenting.
Aston, Penelope Submitter ID: 73811	PC1-5363	Policy 7	<p>Policy 7: DELETE Nitrogen Reference Point from PPC1.</p> <p>OR AMEND to ensure that the OVERSEER Model is not solely relied on but is part of a range of measurement tools.</p> <p>AND AMEND to ensure where Overseer is used that Best Management Practices are applied, including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters.</p> <p>AND REMOVE the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point through these provisions including rules as losses are low.</p> <p>AND ADOPT a sub-catchment approach to addressing contaminants that are relevant to each farm, not a blanket restriction of one particular nutrient that may not even be relevant to the water bodies in that sub-catchment.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number.</p> <p>FFNZ agrees with the submitter's proposal that there ought to be the ability to use models other than Overseer to estimate nitrogen where Overseer is not appropriate (e.g. there are mitigations that Overseer does not recognise) or changes to Overseer input standards. In its submission on Variation 1, FFNZ has proposed changes to the Schedules to provide for this.</p> <p>FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. For these reasons FFNZ does not agree with the submitter-</p>

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			<p>AND AMEND to use Farm Environment Plans to determine what would work best on each farm and science to determine which contaminants are an issue in each sub-catchment.</p>		<p>s request to delete the NRP but agrees about the use of Overseer.</p> <p>FFNZ disagrees with the submitter's point that those farms under 18 stock units should not have to obtain an NRP but only on the basis that the amendments it has proposed in its submission on Variation 1 are adopted i.e. flexibility is provided (particularly for those below a permitted baseline) to increase nitrogen in appropriate circumstances (and an appropriate consenting pathway is available).</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a "one-size fits all" approach is not appropriate and will not achieve sustainable management. Similarly, FFNZ does not support the allocation of contaminants and considers that flexibility needs to be provided for land use change or intensification of activities or changes to farm systems where appropriate (and as provided for in the amendments attached to its submission on Variation 1).</p> <p>FFNZ does not agree with the submitter that nitrogen should be calculated on the basis of the natural capital of soils. FFNZ does not support nitrogen allocation. FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils.</p> <p>FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen (and if LUC is not used, there is no other reasonable proxy), there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. In terms of the NRP, FFNZ considers that the period for the benchmarking years needs to be changed and that there needs to be a reasonable pathway to increase nitrogen in appropriate circumstances. With these changes it would not be an allocation approach and would not be grand parenting.</p>
<p>A S Wilcox & Sons Ltd Submitter ID: 73142</p>	<p>PC1-4314</p>	<p>Policy 7</p>	<p>AMEND Policy 7 to include the 'polluter pays' principle.</p>	<p>Oppose</p>	<p>FFNZ considers that the 'polluter pays' principle is ambiguous. It is not clear how it would be applied, who would be affected and what the environmental, social, economic and cultural implications would be.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ also supports an approach that focuses on "bang for buck" mitigations and targets hot spots. FFNZ considers that the amendments it proposes in its submission on Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>catchment scale actions that are proportionate and tailored and prioritised</p> <p>FFNZ does not support the allocation of nitrogen or an approach that is concerned with characterising certain farming activities as “high polluters” without consideration of particular characteristics or circumstances. FFNZ considers that its MPA framework provides for this.</p> <p>For these reasons FFNZ opposes this submission.</p>
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6135	Policy 7	<p>AMEND Policy 7 as follows: "Prepare for future diffuse discharge reduction and any future property or enterprise level allocation of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, Collect information and undertake research for the purposes of developing future regional plan changes to support this including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'. Any future land allocation should consider the following principles:</p>	Support in part	<p>FFNZ agrees that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime.</p> <p>FFNZ considers that the last part of the final sentence ought to also be deleted because it is premature to determine that there will be allocation or that allocation will be based on LUS.</p> <p>FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation)' and</p> <p>b. Allowance for flexibility of development of tangata whenua ancestral land; and</p> <p>c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and</p> <p>d. Future allocation decisions should take advantage of new data and knowledge."</p>		
<p>Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085</p>	<p>PC1-10880</p>	<p>Policy 7</p>	<p>AMEND PPC1 to define and include the schedule in Appendix 1 of this submission which shows the allocation status of nutrient loads in sub-catchments</p> <p>AND AMEND to ensure that farming activities comply with a nitrogen leaching rate which is based on allocating the total allowable load of nitrogen for the sub-catchment on the basis of either a flat per hectare allocation of nitrogen leaching (~15khN/ha/yr), or a nitrogen leaching allowance per hectare based on an allocation defined by natural carrying capacity</p> <p>AND AMEND to enable users undertaking farming activities to manage discharges allocated on a sub-catchment level to make further reductions in the future, including provision for trading of</p>	<p>Oppose</p>	<p>FFNZ considers that there is no need to allocate nitrogen and nitrogen can be appropriately managed without allocating as proposed in its submission on Variation 1.</p> <p>FFNZ opposes the use of LUC(or stock carrying capacity or a flat nitrogen leaching allowance per ha or any other way to allocate nitrogen) to set nitrogen limits or targets or to allocate nitrogen. FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen, there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			contaminant loss rates in the same sub-catchment.		FFNZ supports sub-catchment management and coordinated actions and a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. Furthermore, FFNZ does not support a nitrogen trading regime because such a regime implies that nitrogen has been allocated to a property, a property right created and FFNZ considers that it is not necessary or desirable to allocate nitrogen.
Awaroa Lands Ltd Submitter ID: 73627	PC1-11042	Policy 7	REMOVE Nitrogen Reference Point and use of the OVERSEER Model from PPC1. AND AMEND so that each farm can review contaminant issues. AND AMEND so that natural capital - not specific years or grandparenting, but can be used as a reference point of higher and best use for sustainable production.	Support in part Oppose in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. In its submission on Variation 1, FFNZ also proposes changes to the Schedules to provide for the use of other models where Overseer is not appropriate. It also proposes flexibility for the input data standards. For these reasons FFNZ does not agree with the submitter that the NRP and Overseer ought to be deleted but only on the proviso that PC1 is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>amended as proposed in FFNZ's submission on Variation 1 (i.e. to address the matters above). FFNZ agrees that each farm needs flexibility to review contaminant issues and considers that this is provided for in the amendments it proposes to the FEPs in its submission on Variation 1.</p> <p>FFNZ does not support the proposal to use natural capital as a reference point. FFNZ does not support the allocation of contaminants and considers that flexibility needs to be provided for land use change or intensification of activities or changes to farm systems, where appropriate (and as provided for in the amendments attached to its submission on Variation 1). For these reasons FFNZ supports the submission allowing each farm to review its contaminant issues as FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues.</p> <p>FFNZ does not support the allocation of nitrogen on the basis of LUC (or some other "proxy" for natural capital) because LUC is not a proxy for nitrogen (and there is no other appropriate proxy for natural capital), there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural gains costs on the society as well as give windfall gains and fail</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Babington, Cliff and Leonie Submitter ID: 72821	PC1-9454	Policy 7	AMEND PPC1 to enable farm use change while providing for environmental mitigation and financial stability AND REMOVE reference to the Nitrogen Reference Point AND AMEND so that all landowners have the same Nitrogen Reference Point, which is the same level that high discharges cannot exceed.	Support in part Oppose in part	<p>to recognise existing capital and on farm investment and land use.</p> <p>FFNZ supports provisions for intensification or land use change in appropriate circumstances. FFNZ agrees with the first part of this submission point because it considers that it is consistent with its proposed amendments in its submission on Variation 1 for example, to provide for nitrogen to increase in appropriate circumstances such as a result of increasing stocking rates on flat land to retire steep land.</p> <p>FFNZ does not agree with the request to delete the NRP. FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ does not support the deletion of the NRP provided it is used as a reference and is not to form the basis of any consideration of future allocation.</p> <p>FFNZ does not agree with the submitter's proposal that all land has the same NRP. FFNZ considers that such an approach would not only be inflexible but would also impose significant economic, cultural and social cost and it is unlikely to result in net environmental benefit.</p> <p>FFNZ supports a tailored and proportionate approach to nitrogen management that considers the issues on each farm. FFNZ considers that a "one-size fits all" approach is not appropriate and will not achieve sustainable management.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Babington, Kelvin and Katherine Submitter ID: 71761	PC1-6642	Policy 7	DELETE the long term land use provisions of Policy 7. AND DELETE the Nitrogen Reference Point provisions of Policy 7. AND AMEND PPC1 to include rules for the elimination of koi carp. AND AMEND PPC1 to include any consequential amendments arising from the submission process. AND AMEND and RENOTIFY PPC1 when there is a clear indication of what land use is required on farms.	Support in part	FFNZ agrees that there needs to be an appropriate framework for generational improvement and for this reason it considers it premature to adopt 80 year numeric targets at this stage and it instead recommends a narrative approach based the values and Vision & Strategy. It is not clear what the submitter means by “delete long term land use provisions in Policy 7” but to the extent they are consistent with FFNZ's views, it supports the submission point. FFNZ does not agree that the NRP ought to be deleted but only on the basis that it is a reference point and not used to allocate nitrogen. FFNZ refers to its submission on Variation 1 and how it proposes the NRP is used (and in particular flexibility to increase nitrogen in appropriate circumstances).
Bailey, James Submitter ID: 73926	PC1-9021	Policy 7	AMEND Policy 7 to replace the 'staged' approach with an 'Adaptive Management' approach to managing nitrogen and all contaminants AND AMEND PPC1 to recognise Land Use Suitability and Natural Capital as the basis of nitrogen management AND AMEND to enable transition toward the Vision and Strategy with Land Use Suitability as a starting point and using Adaptive Management as our understanding develops, reviewing and adapting through subsequent plan changes. AND DELETE the Policy 7 requirement to manage property level discharges to a Nitrogen Reference Point based on historic profiles	Support in part Oppose in part	It is not clear what is meant by adaptive management as it can take many forms and variations and the submitter did not provide further particulars. The intention appears to be that provision is made for review and amendment as more information becomes available. FFNZ would support such an approach. FFNZ would not support an adaptive management approach if it meant taking a cautious approach (i.e. being more conservative in targets or more restrictive in controlling activities) until more or better information is available. FFNZ does not agree that LUC or natural capital ought to be the basis of nitrogen management. LUC is still a high level concept (not available to manage nitrogen and its merits for allocation are

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND PPC1 to apply Land Use Suitability and Natural Capital now by including allocation based on the Natural Capital of soils through a Land Use Capability approach</p> <p>AND AMEND to provide a flexibility cap for low leaching farm systems below a certain threshold (20kg/N/ha/yr) that is deemed as a sustainable level for the transition period, with farmers with a Nitrogen Reference Point below this enabled to increase up to this point.</p>		<p>not able to be assessed) and to date natural capital has been based on LUC. FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen, there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. For these reasons FFNZ does not agree with these submission points.</p> <p>FFNZ does not agree that the NRP ought to be deleted but only on the basis that it is a reference point and not used to allocate nitrogen. FFNZ refers to its submission on Variation 1 and how it proposes the NRP is used (and in particular flexibility to increase nitrogen in appropriate circumstances).</p> <p>FFNZ does not support any allocation approach because there is no reliable or equitable way to allocate nitrogen and the environmental outcomes can be achieved without allocation. FFNZ refers further to the reasons set out in its submission on variation 1.</p> <p>FFNZ agrees that flexibility ought to be provided for low nitrogen emitters. The threshold it proposes in its submission on Variation 1 is 15kgN/ha or some other appropriate permitted</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					baseline. It would support the 20kgN/ha proposed by this submitter if this was supported by modelling (FFNZ does not have enough information at present to form a view on this particular threshold).
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6878	Policy 7	AMEND Policy 7 to DELETE the reference to the need for any future allocation to consider the principles set out in (a) to (d) OR AMEND to read: "From 1 July 2026, Anyany future allocation should consider..." AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	Support in part	FFNZ agrees that the principles in a to d ought to be deleted. FFNZ considers that it is premature to determine that nitrogen allocation is appropriate or that it will be based on the listed principles. FFNZ agrees that in the alternative this paragraph should be tempered to "should consider" but that is a second best outcome. The best outcome is to delete the paragraph.
Balle, Patricia Katherine Submitter ID: 72557	PC1-4472	Policy 7	RETAIN reductions in diffuse discharges while considering land suitability in Policy 7 AND enable tailored Farm Environment Plans to adopt mitigation appropriate to the level of water quality gains AND AMEND to ensure that sub-catchment management approaches are developed through collaborative stakeholder engagement.	Support in part Oppose in part	FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan. FFNZ supports a tailor FEP approach and a sub-catchment approach. It refers to the changes proposed to the FEP requirements and the method on sub-catchment action plans and also catchment profiles as set out in its submission Variation 1. For these reasons FFNZ supports the second two points in this submission point.
Balle Bros Group Submitter ID: 67834	PC1-11411	Policy 7	AMEND Policy 7 to read: "Policy 7 preparing for allocation in the future... During Stage 1, work collaboratively with relevant stakeholders to develop a sub-catchment management approach to manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by	Support in part Oppose in part	FFNZ supports the first part of the amendments i.e. sub-catchment management approach and assist this process by collecting information. However, it is opposed to allocation of nitrogen and to determining in this plan change that it is appropriate, necessary and that it should be based on LUS and the listed principles.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			implementing the policies and methods in this chapter. To assist this process, collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability' for allocation. Any future Allocation should consider the following principles:"		For these reasons FFNZ does not agree with and therefore opposes the last part of the track changes this submitter proposes.
Barker, Christopher Ferguson Submitter ID: 73075	PC1-3749	Policy 7	AMEND Policy 7(b) to prevent extreme high diffuse discharge.	Oppose	<p>FFNZ does not agree with this submission. Instead, FFNZ supports a tailored approach that tailors individual FEPs to the particular issues in the sub-catchment, maintains proportionality and involves an assessment of costs (as proposed by its MPA framework).</p> <p>FFNZ supports the use of the 75th percentile to require high nitrogen emitters to reduce. But considers an appropriate consenting pathway needs to be provided (as set out in its submission on Variation 1) where they cannot e.g. due to soil or climate they are high but they operate at GMP or higher.</p> <p>FFNZ does not support a blanket or one size fits all approach that requires all high emitters of any contaminant to reduce without consideration of characteristics.</p>
Beef + Lamb New Zealand Limited	PC1-11491	Policy 7	AMEND Policy 7 to make it a Method. AND AMEND Policy/Method 7 as follows:	Oppose	FFNZ does not support the allocation of any contaminant because it considers there is no

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73369			<p>“Natural Resource Preparing for Allocation in the future Prepare for further diffuse discharge reductions and any future property or enterprise-level allocation of diffuse discharges of Nitrogen, Phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the Policies and Methods in this chapter. To ensure this occurs, collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining ‘land suitability’. Work with stakeholders to determine sub-catchment specific allocation of natural resources including the assimilative capacity of freshwater. The allocation approaches should apply; Any future allocation should consider the following principles:</p> <p>a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is</p>		<p>reliable or equitable way to allocate, it is premature to signal this now and it is not necessary. It instead supports a stock take in 10 years as to what improvements have been made, what better information is available and what the appropriate way forward is.</p> <p>For these reasons FFNZ seeks that the submission point is not allowed.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>treated the same for the purposes of allocation); and</p> <p>b. Allowance for flexibility of development of Tangata Whenua ancestral land; and</p> <p>c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and</p> <p>d. Future allocation decisions should take advantage of new data and knowledge.”</p> <p>AND ADD the allocation principles in Appendix 1 of the submission and those set out in the general Section of the submission.</p> <p>AND ADD new clauses to take into account the degree to which land use is optimised to the natural capital of soils and assimilative capacity of water.</p> <p>AND AMEND to adopt submissions set out in relation to the management and allocation of Nitrogen.</p>		
<p>Briggs, Graham John Submitter ID: 73938</p>	<p>PC1-3176</p>	<p>Policy 7</p>	<p>AMEND Policy 7 by providing a fair limit of 30 kilograms per hectare, per year for all farm types and closely monitor. For those who farm above incur costs and provide possible awards for low end emitters.</p> <p>AND MAKE any other consequential amendments.</p>	<p>Oppose</p>	<p>FFNZ considers that there is no reliable or equitable way to allocate nitrogen and no need to allocate nitrogen. FFNZ recognises a need for flexibility for low nitrogen emitters and considers this is better dealt with as set out in its submission on Variation 1.</p> <p>FFNZ does not support allocation of contaminants to a property level and instead supports a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere).</p> <p>The submitter's proposal that all farmers receive 30kgN/ha is a form of allocation and FFNZ considers it will impose significant economic, social, cultural costs for no net environmental benefit. Therefore, it opposes the submission.</p>
<p>Briggs, Robin John Submitter ID: 73920</p>	<p>PC1-4961</p>	<p>Policy 7</p>	<p>AMEND Policy 7 to a nitrogen cap set at 30kgN/ha for all farms. Farms higher than 30kg/ha pay a fee for this right. AND AMEND so that farms under 30kgN/ha nitrogen cap have minimum restrictions imposed on them. AND AMEND so that farm under 30kgN/ha are to fence main water ways (lakes, rivers) only. AND AMEND so that farm under 30kgN/ha have an Environmental Farm Plan to back this up. AND AMEND to a more reliable tool of measuring nitrogen than OVERSEER. AND MAKE any consequential amendments.</p>	<p>Oppose</p>	<p>FFNZ considers that there is no reliable or equitable way to allocate nitrogen and no need to allocate nitrogen. FFNZ recognises a need for flexibility for low nitrogen emitters and considers this is better dealt with as set out in its submission on Variation 1.</p> <p>FFNZ does not support allocation of contaminants to a property level and instead supports a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere).</p> <p>The submitter's proposal that all farmers receive 30kgN/ha is a form of allocation and FFNZ considers it will impose significant economic, social, cultural costs for no net environmental benefit. Therefore it opposes the submission.</p> <p>FFNZ agrees that a more reliable tool than Overseer ought to be investigated and that alternatives to Overseer ought to be considered,</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					where appropriate (as set out in more detail in FFNZ's submission on Variation 1).
Brodie, Philip Donald Submitter ID: 67406	PC1-2857	Policy 7	AMEND Policy 7a to include in the allocation criteria/principle the owner's management skills and ability.	Support in part	<p>FFNZ considers that good management practice has a role in the farming and agricultural industry (in particular where practices are evolving or involve subjective elements or need to be tailored to particular circumstances).</p> <p>FFNZ believes it is premature to allocate nitrogen and notwithstanding that it is helpful to take into account the management skills when managing nitrogen on a property. FFNZ supports carrying-out significant changes in Policy 7 and believe farm management skills and ability will be one of the best ways to mitigate adverse effects.</p>
Brooks, Hayden Gregory and Susan Jennifer Submitter ID: 71174	PC1-84	Policy 7	DELETE Policy 7 in its entirety. AMEND Policy 7 to include rules for the elimination of koi carp with any consequential amendments arising from the submission process.	Support in part	<p>FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In the alternative, if FFNZ's proposed amendments are not accepted, FFNZ supports the deletion of Policy 7.</p> <p>FFNZ agrees that koi carp and pest fish controls ought to be investigated and pursued. Similarly, FFNZ agrees that koi carp are a water quality issue and needs to be considered and</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					addressed; however, FFNZ does not agree with more stringent targets or objectives being imposed on farmers and FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment.
Cameron, Bruce Submitter ID: 60603	PC1-6346	Policy 7	RETAIN reducing diffuse discharges while considering land suitability AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan AND ensure that Waikato Regional Council should work collaboratively with stakeholder groups to develop a sub-catchment management approach.	Support in part Oppose in part	FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed). The use “appropriate mitigation strategies “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point. FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.
Carter, Michael and Jackie, Matthew and Amy Submitter ID: 73372	PC1-6553	Policy 7	REMOVE the reference to the Nitrogen Reference Point system and the use of OVERSEER Model AND REPLACE with a farm stocking policy based on Land Use Capability classes, which would be assessed during development of the Farm Environmental Plan, particularly around problem waterways.	Oppose	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen (and if LUC is not used, there is no other reasonable proxy), there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. For these reasons, FFNZ does not support this submission point.</p>
Chapman, Brenhan J Submitter ID: 72776	PC1-10223	Policy 7	AMEND Policy 7 future allocation principles to include the polluter pays concept.	Oppose	<p>FFNZ considers that the 'polluter pays' principle is ambiguous. It is not clear how it would be applied, who would be affected and what the environmental, social, economic and cultural implications would be.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ also supports an approach that focuses on "bang for buck" mitigations and targets hot spots. FFNZ considers that the</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>amendments it proposes in its submission on Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-catchment scale actions that are proportionate and tailored and prioritised</p> <p>FFNZ does not support the allocation of nitrogen or an approach that is concerned with characterising certain farming activities as “high polluters” without consideration of particular characteristics or circumstances. FFNZ considers that its MPA framework provides for this.</p> <p>For these reasons FFNZ opposes this submission.</p>
Chapman, John K Submitter ID: 73086	PC1-10685	Policy 7	AMEND Policy 7 to recognise the polluter pays concept in the future allocation principles.	Oppose	<p>FFNZ considers that the ‘polluter pays’ principle is ambiguous. It is not clear how it would be applied, who would be affected and what the environmental, social, economic and cultural implications would be.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ also supports an approach that focuses on “bang for buck” mitigations and targets hot spots. FFNZ considers that the amendments it proposes in its submission on Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-catchment scale actions that are proportionate and tailored and prioritised</p> <p>FFNZ does not support the allocation of nitrogen or an approach that is concerned with</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>characterising certain farming activities as “high polluters” without consideration of particular characteristics or circumstances. FFNZ considers that its MPA framework provides for this.</p> <p>For these reasons FFNZ opposes this submission.</p>
<p>Chapman, Sharon M Submitter ID: 73084</p>	<p>PC1-10728</p>	<p>Policy 7</p>	<p>AMEND Policy 7 future allocation principles to recognise the polluter pays concept.</p>	<p>Oppose</p>	<p>FFNZ considers that the ‘polluter pays’ principle is ambiguous. It is not clear how it would be applied, who would be affected and what the environmental, social, economic and cultural implications would be.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ also supports an approach that focuses on “bang for buck” mitigations and targets hot spots. FFNZ considers that the amendments it proposes in its submission on Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-catchment scale actions that are proportionate and tailored and prioritised</p> <p>FFNZ does not support the allocation of nitrogen or an approach that is concerned with characterising certain farming activities as “high polluters” without consideration of particular characteristics or circumstances. FFNZ considers that its MPA framework provides for this.</p> <p>For these reasons FFNZ opposes this submission.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Chapman, Victor J Submitter ID: 72779	PC1-10707	Policy 7	AMEND Policy 7 future allocation principles to recognise the polluter pays concept.	Oppose	<p>FFNZ considers that the ‘polluter pays’ principle is ambiguous. It is not clear how it would be applied, who would be affected and what the environmental, social, economic and cultural implications would be.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ also supports an approach that focuses on “bang for buck” mitigations and targets hot spots. FFNZ considers that the amendments it proposes in its submission on Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-catchment scale actions that are proportionate and tailored and prioritised</p> <p>FFNZ does not support the allocation of nitrogen or an approach that is concerned with characterising certain farming activities as “high polluters” without consideration of particular characteristics or circumstances. FFNZ considers that its MPA framework provides for this.</p> <p>For these reasons FFNZ opposes this submission.</p>
Charion Investment Trust Submitter ID: 71344	PC1-7754	Policy 7	REPLACE Policy 7 with the following: <u>"Gather information and undertake scientific research about discharges and contaminant loads in the Waikato and Waipā catchments to support future policy making which will most effectively and efficiently achieve reductions in nitrogen, phosphorus</u>	Support in part	<p>FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>sediment and E.coli beyond those identified in Objective 3."</u>		FFNZ does not agree with more stringent targets or objectives being imposed on farmers therefore FFNZ does not agree with the submission point in reducing contaminants beyond what is required in Objective 3.
Chhagn Bros Co Ltd Submitter ID: 73762	PC1-5562	Policy 7	AMEND the principles in Policy 7 to recognise the polluter pays concept.	Oppose	<p>FFNZ considers that the 'polluter pays' principle is ambiguous. It is not clear how it would be applied, who would be affected and what the environmental, social, economic and cultural implications would be.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ also supports an approach that focuses on "bang for buck" mitigations and targets hot spots. FFNZ considers that the amendments it proposes in its submission on Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-catchment scale actions that are proportionate and tailored and prioritised</p> <p>FFNZ does not support the allocation of nitrogen or an approach that is concerned with characterising certain farming activities as "high polluters" without consideration of particular characteristics or circumstances. FFNZ considers that its MPA framework provides for this.</p> <p>For these reasons FFNZ opposes this submission.</p>

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<p>Christian and Anderson, Ashley John and Frances Ann Submitter ID: 73064</p>	<p>PC1-4756</p>	<p>Policy 7</p>	<p>Policy 7: REMOVE the use of OVERSEER Model to derive the Nitrogen Reference Point AND AMEND to invest in a purpose built model to deliver information on properties and management practices and to enable a base/reference point to be established. AND AMEND so nitrogen usage is allocated on an individual property capacity (as denoted in the Farm Environment Plan which would take into account soil type, climatic conditions, etc). AND AMEND so the sub-catchment approach focuses on contaminants that are pertinent to individual farms (as denoted in the Farm Environment Plan). AND AMEND so nutrient management methods are not based on grandparenting. Use science to regulate appropriate usage.</p>	<p>Support in part Oppose in part</p>	<p>FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ does not understand what is meant by a base/reference point, but if this means a benchmark FFNZ would support it, or in the alternative, if this is an allocation FFNZ does not support it.</p> <p>FFNZ does not support allocation of contaminants to a property level and instead supports an approach that considers all sources of contaminants and tailored actions in the FEPs to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere)</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Furthermore, FFNZ also agrees that robust science is required and information gaps ought to be addressed. For this reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					information that will be collated and amendments to paragraph c to clarify what needs to be researched. For these reason, FFNZ agrees with this submission point.
Clayton-Greene, Cindy and Warren Submitter ID: 71426	PC1-1220	Policy 7	DELETE from Policy 7 the requirement for a farm to manage and not exceed the Nitrogen Reference Point.	Oppose	FFNZ does not support the allocation of contaminants and considers that flexibility needs to be provided for land use change or intensification of activities or changes to farm systems where appropriate (and as provided for in the amendments attached to its submission on Variation 1). For this reason, FFNZ disagrees with this submission point.
Clements, Robyn Ethel Submitter ID: 73097	PC1-7743	Policy 7	DELETE Policy 7 in its entirety. OR AMEND Policy 7 by substituting to individual Farm Environment Plans instead of the OVERSEER Model to determine land use capability and individual farm base discharge allowance. AND AMEND to provide Nitrogen Reference Point grant credits to farms where evidence farming practices have been environmentally active to reduce use of nitrogen and other potential contaminants. AND AMEND Nitrogen Reference Points to recognise historic lower use of Nitrogen by beef and sheep farms to dairy and allow prescribed favourable variation for that farm type. AND any consequential amendments. DELETE Policy 7. OR AMEND to use methods that look at land use capability to assess land use.	Oppose	FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In the alternative, if FFNZ's proposed amendments are not accepted, FFNZ supports the deletion of Policy 7. While FFNZ may see merit in trading or transfer in principle (and in appropriate circumstances and with appropriate market conditions), FFNZ does not support the introduction of nutrient transfer or trading regimes in PC1 because that would involve allocating nutrients to a property level to give land owners a property right to trade.

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					<p>FFNZ repeats its concerns about allocation including that there is no reliable and equitable way to allocate, there is no need to allocate and issues with Overseer including how to accommodate version change and how that might impact on a trading regime if the number keeps changing. For these reasons, FFNZ does not support this submission point.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ does not support the use LUC as LUC is not a proxy for nitrogen (and if LUC is not used, there is no other reasonable proxy), there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. For these reasons, FFNZ does not support this submission point.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10782	Policy 7	DELETE Policy 7 and REPLACE with: <u>“Collect information and undertake research about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and research the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining ‘land suitability’.</u> <u>Any future regulation should consider the following principles:</u> <u>a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation);</u> <u>b. Future regulation decisions should take advantage of new data and knowledge.”</u>	Support in part Oppose in part	FFNZ agrees that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. FFNZ does not agree that LUS ought to be the basis of nitrogen management. LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed). FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen, there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use.
Coleman, Mark and Ruth Submitter ID: 71424	PC1-7420	Policy 7	DELETE Policy 7. AND REMOVE sheep and beef farms from Nitrogen Reference Point provisions AND MAKE any consequential amendments.	Supports in part	FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ agrees that the key parts of Policy 7, relevantly paragraphs a-d, ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In the alternative, if FFNZ's proposed amendments are not accepted, FFNZ supports the deletion of Policy 7.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p>
<p>Craig, Jeffery Submitter ID: 73072</p>	<p>PC1-9729</p>	<p>Policy 7</p>	<p>REMOVE the Policy 7 use of the Nitrogen Reference Point and consider individual farm issues AND AMEND to extend the timeframe to enable alternative programmes to Overseer to be developed AND AMEND to ensure an even playing field for contaminant discharges irrespective of past levels AND AMEND to provide clarity on how discharge levels and reductions will work in practical terms AND AMEND to consider land use change as a whole over the country rather than by property or owner AND REMOVE the Māori land exclusion from land use change restrictions</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ believes that there needs to be an appropriate framework for generational improvement and for this reason it considers it premature to adopt 80 year numeric targets at this stage and it instead recommends a narrative</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND to provide a reliable and easy to use measurement basis for each contaminant and for each property AND AMEND to provide for Council to remove carp.		<p>approach based the values and Vision & Strategy.</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. Similarly, FFNZ does not support the allocation of contaminants and considers that flexibility needs to be provided for land use change or intensification of activities or changes to farm systems where appropriate (and as provided for in the amendments attached to its submission on Variation 1).</p> <p>FFNZ agrees that koi carp and pest fish controls ought to be investigated and pursued. Similarly, FFNZ agrees that koi carp are a water quality issue and needs to be considered and addressed; however, FFNZ does not agree with more stringent targets or objectives being imposed on farmers and FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment.</p> <p>Furthermore, FFNZ also agrees that robust science is required and information gaps ought to be addressed. For this reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched.</p>
DairyNZ	PC1-10229	Policy 7	RETAIN provisions of PPC1 that are focused on information and processes	Support in part	FFNZ agrees that robust science is required and information gaps ought to be addressed. For this

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 74050			<p>needed for plan reviews AND AMEND to ensure there is a focus on the course of action to fill information gaps before the review of PPC1.</p> <p>AND AMEND Policy 7 to read: <u>"Identify and fill information gaps to</u> Pprepare for further diffuse discharge reductions and any future property or enterprise-level allocation <u>limits</u> of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will <u>may</u> be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, <u>research will be undertaken in partnership with technical and industry organisations, in a manner that allows people and communities to understand the social, environmental, cultural and economic implications of the current plan, and engage in debate about any future limits, collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'"</u></p> <p>AND DELETE Policy 7 (a – d).</p>	Oppose in part	<p>reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched.</p> <p>FFNZ agrees that the focus of Policy 7 ought to be on collating further information and undertaking research. Similarly, FFNZ considers that it is premature to determine the future allocation regime.</p> <p>FFNZ considers that the last part of the final sentence ought to also be deleted because it is premature to determine that there will be allocation or that allocation will be based on LUS.</p> <p>FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Denize, Mathew John Submitter ID: 72701	PC1-7632	Policy 7	RETAIN Policy 7 reduction of diffuse discharges while considering land suitability. AMEND PPC1 to enable appropriate mitigation strategies through tailored Farm Environment Plans, and require the Council to work collaboratively with stakeholder groups to develop sub-catchment management approaches.	Support in part Oppose in part	FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen, there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. FFNZ supports a tailored and proportionate sub-catchment management approach with this process assisted by collecting information where the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. However, FFNZ is opposed to allocation of nitrogen and to determining in this plan change that it is appropriate, necessary and that it should be based on LUS and the listed principles.
Department of Conservation Submitter ID: 71759	PC1-10667	Policy 7	AMEND Policy 7 so that the criteria for identifying land suitability is used now to implement a land based allocation regime that achieves the purpose of the RMA by ensuring that the potential of natural and physical resources is sustained to meet the reasonably foreseeable needs of future generations. AND AMEND to read: "...the policies and methods in this chapter. To ensure this occurs, collect information and undertake research to support this, including collecting	Oppose	FFNZ agrees that robust science is required and information gaps ought to be addressed. For this reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched. FFNZ considers that the focus of Policy 7 ought to be on collating further information and undertaking research. Similarly, FFNZ considers that it is premature to determine the future allocation regime.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>information about current discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'. Any future allocation should consider the following principles:"</p> <p>AND DELETE Bullet points (a), (b), (c) and (d) [NOTE that the submitter may have mistakenly requested that all of this be deleted from Policy 7, given that they also asked for Policy 7(b) and (d) to be amended].</p> <p>Consequential relief is that the deleted text should be included as a method under section 3.11.4 [see submission point 10633].</p> <p>AND AMEND clause (b) to clarify what is meant by flexibility of development of tangata whenua ancestral land and how this part of the policy will be achieved.</p> <p>AND AMEND clause (d) to include the term 'where appropriate' or wording with similar effect to ensure that new data and knowledge is used where it is relevant, reliable and accurate for the particular allocation being considered.</p>		<p>FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles.</p> <p>FFNZ is opposed to allocation of nitrogen and to determining in this plan change that it is appropriate, necessary and that it should be based on LUS and the listed principles.</p>
Dixon, Grant Submitter ID: 73980	PC1-7739	Policy 7	<p>AMEND PPC1 so the Farm Environment Plan provides the reference point for nitrogen efficiency for each enterprise.</p> <p>AND AMEND PPC1 so that an industry standard, forms the base measurement for increasing efficiency.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports a tailored and proportionate sub-catchment management approach with this process assisted by collecting information where the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a "one-size fits all" approach is not appropriate and will not achieve</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>sustainable management. For these reasons FFNZ does not agree with this submission point.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p>
Dunlop, Tania Submitter ID: 71249	PC1-636	Policy 7	<p>DELETE Policy 7 and REPLACE with a new land use change policy that covers the whole country and applies to all land equally AND REPLACE the Nitrogen Reference Point with a reliable easy to use measurement for each contaminant and each property AND Council to develop a plan to get rid of carp AND DELETE all references to the Nitrogen Reference Point and consider individual farm issues AND DELETE the use of the OVERSEER Model and REPLACE with a program that is easy to use, land owners can set up and works AND AMEND to extend the time frame to allow more Council programmes to be developed.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports a tailored and proportionate sub-catchment management approach with this process assisted by collecting information where the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ agrees that koi carp are a water quality issue and needs to be considered and addressed; however, FFNZ does not agree with more stringent targets or objectives being imposed on farmers and FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment.</p> <p>FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80; furthermore. FFNZ does not agree with more stringent targets or objectives being imposed on farmers therefore FFNZ does not agree with the submission point in allowing more Council programmes to be developed.</p>
Edmonds, Suzanne Louise Submitter ID: 71085	PC1-633	Policy 7	AMEND Policy 7 to have a shorter timeframe.	Oppose	<p>FFNZ opposes the submission point on reduction in overall timeframe.</p> <p>FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years (never mind shortening the overall time frame) when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others. Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short term targets</p>

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					which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.
Ewen, Andrew Hamish and Nicole Lisa Submitter ID: 71210	PC1-285	Policy 7	DELETE Policy 7 in its entirety OR AMEND PPC1 and re-notify once there are clear indications of what land use is required on farms. Nitrogen Reference Point DELETE Nitrogen Reference Point provisions in its entirety Contaminant Loss from Farm AMEND to contain rules for the elimination of koi carp. AND MAKE any other consequential amendments.	Support in part Oppose in part	<p>FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In the alternative, if FFNZ's proposed amendments are not accepted, FFNZ supports the deletion of Policy 7.</p> <p>FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ agrees that koi carp and pest fish controls ought to be investigated and pursued. Similarly,</p>

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					FFNZ agrees that koi carp are a water quality issue and needs to be considered and addressed; however, FFNZ does not agree with more stringent targets or objectives being imposed on farmers and FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9789	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions <u>in diffuse contaminant loss</u> and any future property or enterprise-level allocation of diffuse losses discharges of nitrogen, phosphorus, sediment and microbial pathogens that will <u>may</u> be required by subsequent regional plans, by implementing the policies and methods in this chapter... and researching the spatial variability of land use and contaminant losses the effect of contaminant discharges in different parts of the catchment that will assist in <u>understanding land and land use characteristic affecting contaminant loss defining land suitability</u> '. Any future allocation, taking effect from July 2026, should consider the following principles: a. <u>Land and land use characteristics suitability</u> (5) which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes	Oppose	<p>FFNZ does not agree with the submitter that nitrogen should be calculated on the basis of the natural capital of soils. FFNZ does not support nitrogen allocation. FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils.</p> <p>FFNZ does not agree that LUS or natural capital ought to be the basis of nitrogen management. LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed) and to date natural capital has been based on LUC. FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen, there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. For these reasons FFNZ does not agree with these submission points.</p>

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			<p>of allocation); and ... d. Future allocation decisions should take advantage of new data and knowledge, <u>including mitigation potential</u>" AND AMEND Footnote 5 to read: "5. Future mechanisms for allocation ... The future weightings are to be determined. For the avoidance of doubt, land suitability criteria exclude <u>include</u> current land use and current water quality, the moderating effects of potential mitigations, and non-physical criteria (economic, social and cultural). Instead These factors <u>are</u> will be of importance in analysing the implications of a completed land suitability classification."</p>		
Findlay, Andrew Submitter ID: 72021	PC1-8287	Policy 7	<p>DELETE Policy 7 OR AMEND to provide for Natural Capital, a flexible Nitrogen Reference Point, and sub-catchment water quality AND AMEND to provide for conversion from farming to forestry for unproductive land that is suitable for this enterprise AND AMEND water quality monitoring to provide for individual farm gate testing of loss of contaminants.</p>	<p>Support in part Oppose in part</p>	<p>FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In the alternative, if FFNZ's proposed amendments are not accepted, FFNZ supports the deletion of Policy 7.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils.</p> <p>FFNZ does not support the allocation of contaminants and considers that flexibility needs to be provided for land use change or intensification of activities or changes to farm systems where appropriate (and as provided for in the amendments attached to its submission on Variation 1).</p> <p>FFNZ does not support allocation of contaminants to a property level and instead supports a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere).</p>
Findlay, Thomas David Submitter ID: 73713	PC1-9410	Policy 7	DELETE Policy 7.	Support in part	<p>FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation</p>

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					and that it will be based on these principles. In the alternative, if FFNZ's proposed amendments are not accepted, FFNZ supports the deletion of Policy 7.
Fletcher Trust Submitter ID: 73848	PC1-5945	Policy 7	REPLACE Policy 7 with the following: <u>"Gather information and undertake scientific research about discharges and contaminant loads in the Waikato and Waipā catchments to support future policy making which will most effectively and efficiently achieve reductions in nitrogen, phosphorus, sediments and E.coli beyond those identified in Objective 3."</u>	Support in part	FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. FFNZ does not agree with more stringent targets or objectives being imposed on farmers therefore FFNZ does not agree with the submission point in reducing contaminants beyond what is required in Objective 3.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10474	Policy 7	REPLACE Policy 7 to read: <u>"Policy 7: Preparing for enhanced future water quality management Gather information (including through modelling) and undertake research about discharges and contaminant loads in the Waikato and Waipā catchments to enable future policy making that can most effectively and efficiently achieve reductions in nitrogen, phosphorus, sediment and E.coli beyond those identified in Objective 3."</u>	Support in part	FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. FFNZ does not agree with more stringent targets or objectives being imposed on farmers therefore FFNZ does not agree with the submission point in reducing contaminants beyond what is required in Objective 3.
Gardon Limited Submitter ID: 74113	PC1-5204	Policy 7	AMEND PPC1 so the cost of compliance is shared more equitably through a	Support in part	FFNZ does not consider that the Taupo cap and trade approach is more equitable but it agrees that it may be appropriate to consider incentives

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>system similar to the Lake Taupo catchment nitrogen credit allocation. AND ENSURE further consultation takes place before any decision is made to accept stage 2. AND AMEND to allow for more time to train and recruit an effective supply of rural professionals to support PPC1. AND AMEND to allow for more time to obtain fair and true reference points for land use and to support this with greater education for producers in recording and keeping accurate records. AND AMEND to support the decisions sought by DairyNZ [RETAIN provisions of PPC1 that are focused on information and processes needed for plan reviews AND AMEND to ensure there is a focus on the course of action to fill information gaps before the review of PPC1. AND AMEND Policy 7 to read: “Identify and fill information gaps to Pprepare for further diffuse discharge reductions and any future property or enterprise-level allocation limits of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will <u>may</u> be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, <u>research will be undertaken in partnership with technical and industry organisations, in a manner that allows people and communities to understand the social, environmental,</u></p>	Oppose in part	<p>funding and public/private sharing of costs/benefits.</p> <p>FFNZ believes that there needs to be an appropriate framework for generational improvement and for this reason it considers it premature to adopt 80 year numeric targets at this stage and it instead recommends a narrative approach based the values and Vision & Strategy.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen, there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. For these reasons FFNZ does not agree with these submission points.</p> <p>FFNZ agrees that robust science is required and information gaps ought to be addressed. For this reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>cultural and economic implications of the current plan, and engage in debate about any future limits. collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'.</p> <p>AND DELETE Policy 7 (a – d).] AND AMEND to support the decisions sought by Fonterra [REPLACE Policy 7 to read: "Policy 7: Preparing for enhanced future water quality management Gather information (including through modelling) and undertake research about discharges and contaminant loads in the Waikato and Waipā catchments to enable future policy making that can most effectively and efficiently achieve reductions in nitrogen, phosphorus, sediment and E.coli beyond those identified in Objective 3."]</p>		<p>FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles.</p> <p>FFNZ does not agree with more stringent targets or objectives being imposed on farmers therefore FFNZ does not agree with the submission point in reducing contaminants beyond what is required in Objective 3.</p>
Gaudin, Philip and Pauline Submitter ID: 72820	PC1-9089	Policy 7	<p>REMOVE the Nitrogen Reference Point and the use of the OVERSEER Model from Policy 7 and PPC1 AND AMEND to adopt a sub-catchment approach to addressing contaminants that are relevant to each farm</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND to take soil type and fertiliser history into account when determining nitrogen discharges from a property</p> <p>AND AMEND to use Farm Environment Plans to determine what would work best on each farm</p> <p>AND AMEND to use science to determine which contaminants are an issue in each sub-catchment.</p> <p>AND AMEND to ensure rules are effects- and science-based.</p>		<p>Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p> <p>FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen, there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. For these reasons FFNZ does not agree with these submission points.</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>“one-size fits all” approach is not appropriate and will not achieve sustainable management. For these reasons FFNZ agrees with the parts of the submission point that relate to removing a blanket restriction on nutrients that may not be an issue for the relevant sub-catchment.</p> <p>FFNZ also agrees that robust science is required and information gaps ought to be addressed. For this reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched.</p>
<p>Gleeson, Graeme B Submitter ID: 73800</p>	<p>PC1-6432</p>	<p>Policy 7</p>	<p>AMEND Policy 7 to adopt a sub-catchment approach to focus on contaminants important to each farm and sub-catchment. AND AMEND to ensure Farm Environment Plans assess appropriate land use options for each farm, and encourage better science to determine which contaminants are of concern for each farm and sub-catchment. AND DELETE requirements to manage farming activities to a historic Nitrogen Reference Point AND REPLACE with live weight standards linked to the natural capital of soils, climate and assimilative capacity of water OR allocate nitrogen as it is tied to the natural capital of soils. AND DEVELOP greater understanding about spatial location of natural resources so this knowledge can be applied to better inform and manage contaminant loss.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. For these reasons FFNZ agrees with the parts of the submission point that relate to removing a blanket restriction on nutrients that may not be an issue for the relevant sub-catchment.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. For these reasons, FFNZ supports this submission point.</p> <p>FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen,</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND or ADD new rules that are based on land class and pasture production capability, where land use is supported by the capability of the land giving rise to contaminant loss no greater than acceptable ecosystem health limits. OR ADOPT equal nitrogen allocation flexibility for all land users (at 20kgN/ha) as a permitted activity.</p> <p>AND DELETE the 75th percentile nitrogen leaching value AND REPLACE with requirements and standards that ensure the reductions required in over-allocated catchments, and where nitrogen is an issue, are proportionate to the level of improvement required and the impact of the discharge. Highest dischargers should be targeted first and consideration should be given to the economic implications of reducing and the timeframe for making reductions.</p> <p>AND AMEND the rules to ensure low contaminant loss land uses are a permitted activity.</p> <p>AND AMEND to ensure that high nitrogen dischargers, except horticulture, are required to reduce over time, starting immediately, and achieving 10% reductions every year for the life of PPC1.</p> <p>AND AMEND to ensure horticultural nitrogen losses are managed in a manner that recognises the value of the industry to the community.</p>		<p>there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. For these reasons FFNZ does not agree with these submission points.</p> <p>FFNZ supports the use of the 75th percentile to require high nitrogen emitters to reduce. But considers an appropriate consenting pathway needs to be provided (as set out in its submission on Variation 1) where they cannot e.g. due to soil or climate they are high but they operate at GMP or higher.</p> <p>FFNZ agrees that flexibility ought to be provided for low nitrogen emitters. The threshold it proposes in its submission on Variation 1 is 15kgN/ha or some other appropriate permitted baseline. It would support the 20kgN/ha proposed by this submitter if this was supported by modelling (FFNZ does not have enough information at present to form a view on this particular threshold).</p> <p>FFNZ does not support a blanket or one size fits all approach that requires all high emitters of any contaminant to reduce without consideration of characteristics.</p>

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Goodwright, Sydney Alfred Submitter ID: 72983	PC1-4366	Policy 7	RETAIN reducing diffuse discharges while considering land suitability. Policy 7 AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan. AND AMEND so Waikato Regional Council to work collaboratively with stakeholder groups to develop sub-catchment management approach.	Support in part Oppose in part	<p>FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p> <p>The use “appropriate mitigation strategies “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p>
Guy, Denise and John Submitter ID: 73945	PC1-3818	Policy 7	AMEND PPC1 with clear noification as to what land use is required on a property going forward so farm use can be changed to meet both environmental mitigation and financial stability. AND DELETE the Nitrogen Reference Point provisions AND REPLACE with a provision that the highest nitrate level (that the 'high users' must adhere to) be the upper level for everyone no matter where/what farming type. AND AMEND the contaminant loss from farm provisions of Policy 7 to account for the contribution that Koi Carp make and	Support in part Oppose in part	<p>FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ agrees that koi carp and pest fish controls ought to be investigated and pursued. Similarly,</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			include rules to remove Koi Carp from waterways.		FFNZ agrees that koi carp are a water quality issue and needs to be considered and addressed; however, FFNZ does not agree with more stringent targets or objectives being imposed on farmers and FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment.
Hale, Timothy John Submitter ID: 72688	PC1-1596	Policy 7	AMEND Policy 7 to remove the use of a blanket Nitrogen Reference approach AND ADOPT a sub-catchment methodology to addressing the environmental issues which are relevant to the farms within that catchment. Use Farm Environment Plans to achieve this.	Support	FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. For these reasons FFNZ agrees with the parts of the submission point that relate to removing a blanket restriction on nutrients that may not be an issue for the relevant sub-catchment.
Hamilton City Council Submitter ID: 74051	PC1-10754	Policy 7	AMEND Policy 7 by adding a new principle to read; " <u>(ba) Allowance for urban growth undertaken to give effect to the Waikato Regional Policy Statement; and</u> "	Oppose	FFNZ does not support the principles set out in Policy 7 (and seeks to have them deleted) this is on the basis that FFNZ considers it is premature to allocate nitrogen and for the same reason it would not appropriate to add a new principle. In addition, it is not clear how urban growth would be allowed for and whether that would mean providing an additional allocation for land earmarked for urban use. FFNZ is concerned that such an approach could result in significant social, cultural, and economic cost.
Hancock Forest Management (NZ) Ltd	PC1-5662	Policy 7	AMEND Policy 7 to provide a clearer transition toward a non-grand parenting approach to allocation within the life of PPC1 to create certainty for land users.	Support in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73724					clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.
Hansen, Robin Arthur and Gillian Joy Submitter ID: 73275	PC1-9279	Policy 7	REMOVE Policy 7 Nitrogen Reference Point provisions AND AMEND PPC1 so that it is effects based, allowing the use of better parts of the farm more intensively.	Support in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. FFNZ does not support the allocation of contaminants and considers that flexibility needs to be provided for land use change or intensification of activities or changes to farm systems where appropriate (and as provided for in the amendments attached to its submission on Variation 1).
Hart, John Henry and Susan Graham Submitter ID: 71246	PC1-539	Policy 7	AMEND Policy 7 to provide a model to show what it will look like in 80 years. AND AMEND the Farm Environment Plan requirements to be less restrictive. AND AMEND to replace the Nitrogen Reference Point with an effects-based approach.	Support in part Oppose in part	FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others. Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short and medium term targets which are achievable. As knowledge and information becomes available better and more accurate targets can be progressively set to reach the long term aim.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					FFNZ does not support the allocation of contaminants and considers that flexibility needs to be provided for land use change or intensification of activities or changes to farm systems where appropriate (and as provided for in the amendments attached to its submission on Variation 1).
Henson, Edgar Submitter ID: 73631	PC1-10497	Policy 7	DELETE Policy 7 OR AMEND Policy 7 to have provisions backed up by scientific data.	Support in part	<p>FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In the alternative, if FFNZ's proposed amendments are not accepted, FFNZ supports the deletion of Policy 7.</p> <p>FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p>
Hill Country Farmers Group Submitter ID: 73321	PC1-7742	Policy 7	AMEND Policy 7 to read: "Policy 7: Preparing for allocation in the future ... <u>During Stage 1, work collaboratively with relevant stakeholders to develop a sub-catchment management approach to manage</u> Prepare for further diffuse discharges and any future property or enterprise-level allocation of diffuse	Support in part Oppose in part	<p>FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p> <p>Similarly, FFNZ believes that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>discharges of nitrogen, phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, assist this process, collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability' for allocation.</p> <p>Any future allocation Allocation should consider the following principles:..." AND CONSIDER allocation on a sub-catchment basis. AND CONSIDER land suitability to manage diffuse discharges.</p>		<p>be based on these principles. In the alternative, if FFNZ's proposed amendments are not accepted, FFNZ supports the deletion of Policy 7.</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues.</p> <p>FFNZ does not support the last point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p>
Hira Bhana and Co Ltd Submitter ID: 71757	PC1-4126	Policy 7	AMEND Policy 7 to recognise the polluter pays concept.	Oppose	<p>FFNZ considers that the 'polluter pays' principle is ambiguous. It is not clear how it would be applied, who would be affected and what the environmental, social, economic and cultural implications would be.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ also supports an approach that focuses on "bang for buck" mitigations and targets hot spots. FFNZ considers that the amendments it proposes in its submission on</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-catchment scale actions that are proportionate and tailored and prioritised</p> <p>FFNZ does not support the allocation of nitrogen or an approach that is concerned with characterising certain farming activities as “high polluters” without consideration of particular characteristics or circumstances. FFNZ considers that its MPA framework provides for this.</p> <p>For these reasons FFNZ opposes this submission.</p>
Holmes, Gavin Submitter ID: 73971	PC1-4562	Policy 7	<p>RETAIN Policy 7 with regards to reducing diffuse discharges while considering land suitability</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan</p> <p>AND ensure Waikato Regional Council works collaboratively with stakeholder groups to develop a sub-catchment management approach.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p> <p>The use “appropriate mitigation strategies “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p>

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Horsley, Cam, Bridget, Rob and Tennille Submitter ID: 73412	PC1-6044	Policy 7	AMEND Policy 7 to contain rules for the elimination of koi carp including any consequential amendments. AND DELETE the Nitrogen Reference Point provisions of Policy 7. AND AMEND and RENOTIFY PPC1 when there are clear indications of what land use is required on the submitters farm including any consequential amendments.	Oppose in part	<p>FFNZ agrees that koi carp and pest fish controls ought to be investigated and pursued. Similarly, FFNZ agrees that koi carp are a water quality issue and needs to be considered and addressed; however, FFNZ does not agree with more stringent targets or objectives being imposed on farmers and FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils.</p>
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10070	Policy 7	AMEND Policy 7 to read: "Any future allocation should consider the following principles: a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation); and b. Allowance for flexibility of development	Oppose	<p>FFNZ believes that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles for the same reason it would not appropriate to add new principles.</p> <p>FFNZ considers that the 'polluter pays' principle is ambiguous. It is not clear how it would be applied, who would be affected and what the environmental, social, economic and cultural implications would be.</p>

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			<p>of tangata whenua ancestral land; and c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and d. Future allocation decisions should take advantage of new data and knowledge. <u>And;</u> e. <u>Having regard for the finite nature of High Class Soils</u> f. <u>Incorporating the principle of 'polluter pays'; meaning that when assessed across the balance of contaminant discharges to water those having the greatest effect bear a proportionally greater cost of the transition."</u></p>		
<p>Jefferis, Daniel Submitter ID: 72989</p>	<p>PC1-6824</p>	<p>Policy 7</p>	<p>RETAIN the Policy 7 reduction of diffuse discharges while considering land suitability AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan AND AMEND to have Waikato Regional Council work collaboratively with stakeholder groups to develop a sub-catchment management approach.</p>	<p>Support in part Oppose in part</p>	<p>FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p> <p>The use “appropriate mitigation strategies “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p>

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Jeffries, Gary and Joy Submitter ID: 71214	PC1-7236	Policy 7	Conversion from Farming to Forestry AMEND Policy 7 to plan for the next 80 years, not 10. AND AMEND to a science/scientifically based approach. AND AMEND by providing realistic goals. Nitrogen Management DELETE Policy 7. OR AMEND by using the Farm Environment Plan to measure land use to land capability.	Support in part Oppose in part	<p>FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others. Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short and medium term targets which are achievable. As knowledge and robust scientific information becomes available better and more accurate targets can be progressively set to reach the long term aim. For these reasons FFNZ agrees with the submission points to implement a scientifically based approach with realistic goals.</p> <p>FFNZ does not support the allocation of contaminants and considers that flexibility needs to be provided for land use change or intensification of activities or changes to farm systems where appropriate (and as provided for in the amendments attached to its submission on Variation 1).</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen.</p>

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Jivan Produce Ltd Submitter ID: 71429	PC1-1350	Policy 7	AMEND the principles in Policy 7 to reflect the allocation of attribute targets on a sub-catchment basis in PPC1.	Support in part	FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management.
Jodean Farms Submitter ID: 73439	PC1-7007	Policy 7	DELETE Policy 7 (b).	Support in part	FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. On this basis agrees that paragraph b ought to be deleted.
Johnston, Phillip Submitter ID: 73245	PC1-9155	Policy 7	DELETE Policy 7.	Support in part	FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In the alternative, if FFNZ’s proposed amendments are not accepted, FFNZ supports the deletion of Policy 7.
Kay, Richard Submitter ID: 73490	PC1-9740	Policy 7	AMEND Policy 7 to provide a definite determination of what land is included.	Oppose	FFNZ opposes this submission point as FFNZ opposes the allocation of contaminants and this submission seems to support allocation, although it is largely unknown what the submitter is requesting.

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Kelton, Simon Douglas and Adrienne Judith Submitter ID: 73042	PC1-7871	Policy 7	AMEND Policy 7 to provide for incentives for the conversion to forestry/retiring land.	Oppose	While FFNZ does not support blanket rules and instead supports a tailored approach (e.g. plant forestry or retire land if identified in an FEP following the MPA framework as an appropriate action). FFNZ supports the use of public funding to assist with costs where there is a public good. To the extent that incentives are an appropriate way to achieve this and are reasonably available, FFNZ supports this submission point.
Kidd, Peter Arthur and Marilyn May Submitter ID: 72710	PC1-5702	Policy 7	AMEND to investigate the impact of the Nitrogen Reference Point in PPC1 on the flexibility of low impact pastoral land use.	Support in part	FFNZ considers that there is no reliable or equitable way to allocate nitrogen and no need to allocate nitrogen. FFNZ recognises a need for flexibility for low nitrogen emitters and considers this is better dealt with as set out in its submission on Variation 1.
Kilgour, Gareth Submitter ID: 72950	PC1-1832	Policy 7	AMEND Policy 7 to provide clarity. AND AMEND to remove references to future processes. AND AMEND PPC1 to allow flexibility on all land. AND REMOVE references to future allocation decisions.	Support in part Oppose in part	FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ considers that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In the alternative, if FFNZ's proposed amendments are not accepted, FFNZ supports the deletion of Policy 7. FFNZ does not support the allocation of contaminants and considers that flexibility needs to be provided for land use change or intensification of activities or changes to farm

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					systems where appropriate (and as provided for in the amendments attached to its submission on Variation 1).
Lacewood Holdings Ltd Submitter ID: 72589	PC1-8965	Policy 7	REMOVE the requirements to be held at or below a properties Nitrogen Reference Point, especially for low discharging operations. AND AMEND PPC1 to adopt an alternative method to measure nitrogen such as one based on the natural capacity of soils.	Support in part Oppose in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils.
Lea, Helen Submitter ID: 73363	PC1-9243	Policy 7	AMEND Policy 7 provisions relating to the Nitrogen Reference Point to provide for rules based on land classification, natural capital, tools such as the OVERSEER Model and mitigation measures to manage the land to comply with PPC1.	Oppose in part	FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils. FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. The use “mitigation measures “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.
Lee, Malcolm and Sally Submitter ID: 72932	PC1-8867	Policy 7	<p>AMEND Policy 7/PPC1 to a sub-catchment approach with communities working together AND RENOTIFY and allow submissions on this sub-catchment approach.</p> <p>AND DELETE from Policy 7 provisions relating to the Nitrogen Reference Point. If not deleted then AMEND to provide for a Land Use Capability Approach OR AMEND to provide for a sub-catchment approach to allow catchments to monitor its own land use and nitrogen loading to maintain levels at current levels</p> <p>AND AMEND to provide for the adjustment to PPC1 to contain rules for the elimination of Koi Carp and ensure the cost of this is not put on farmers</p> <p>AND AMEND to provide for water quality improvements required by farmers, be linked to sub-catchments to link the effects caused by farmers either individually or collectively and consider the impacts out of farmer's control</p> <p>AND MAKE any consequential amendments arising from the submission process.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen, there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. For these reasons FFNZ does not agree with this submission points.</p> <p>FFNZ agrees that koi carp and pest fish controls ought to be investigated and pursued. Similarly, FFNZ agrees that koi carp are a water quality issue and needs to be considered and addressed; however, FFNZ does not agree with</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					more stringent targets or objectives being imposed on farmers and FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment.
Lichtwark, Quintin Owen Submitter ID: 72535	PC1-1863	Policy 7	<p>AMEND Policy 7 to read: <u>"Identify and fill information gaps to prepare for further diffuse discharge reductions and any future property or enterprise-level allocation limits of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will may be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, research will be undertaken in partnership with technical and industry organisations, in a manner that allows people and communities to understand the social, environmental, cultural and economic implications of the current plan, and engage in debate about any future limits. collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'."</u> AND DELETE a-d of Policy 7 AND RETAIN provisions of the PPC1 that are focused on information and</p>	Support in part	<p>FFNZ agrees that robust science is required and information gaps ought to be addressed. For this reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched.</p> <p>FFNZ agrees that the focus of Policy 7 ought to be on collating further information and undertaking research. Similarly, FFNZ considers that it is premature to determine the future allocation regime.</p> <p>FFNZ considers that the last part of the final sentence ought to also be deleted because it is premature to determine that there will be allocation or that allocation will be based on LUS.</p> <p>FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles.</p>

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			processes needed for plan reviews. The focus should be on the course of action to fill information gaps before Waikato Regional Council commences the review of PPC1.		
Living Foods Ltd Submitter ID: 73758	PC1-5281	Policy 7	AMEND Policy 7 to recognise the polluter pays concept.	Oppose	<p>FFNZ considers that the 'polluter pays' principle is ambiguous. It is not clear how it would be applied, who would be affected and what the environmental, social, economic and cultural implications would be.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ also supports an approach that focuses on "bang for buck" mitigations and targets hot spots. FFNZ considers that the amendments it proposes in its submission on Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-catchment scale actions that are proportionate and tailored and prioritised</p> <p>FFNZ does not support the allocation of nitrogen or an approach that is concerned with characterising certain farming activities as "high polluters" without consideration of particular characteristics or circumstances. FFNZ considers that its MPA framework provides for this.</p> <p>For these reasons FFNZ opposes this submission.</p>
Logan, Andrea Jane	PC1-12260	Policy 7	RETAIN Policy 7 reduction of diffuse discharges while considering land suitability	Support in part	FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put

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Submitter ID: 73464			AND ENSURE appropriate mitigation strategies through tailored Farm Environment Plans are enabled AND AMEND to require the Council to work collaboratively with stakeholder groups to develop sub-catchment management approaches.	Oppose in part	<p>this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p> <p>The use “appropriate mitigation strategies “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p>
Lumsden, Malcolm John Submitter ID: 73454	PC1-2489	Policy 7	DELETE (b) from Policy 7.	Support it part	FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. On this basis agrees that paragraph b ought to be deleted.
Macdonald, Hamish Stuart Submitter ID: 71433	PC1-2719	Policy 7	AMEND Policy 7 to use a natural capital approach of what the land can actually handle or use a sub-catchment approach and work within communities or combine a natural capital approach and a sub-catchment approach AND AMEND Policy 7 to ensure Farm Environment Plans are used to see what has been done already and to recognise that and to see what is planned in the future	Support in part Oppose in part	<p>FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ also supports an approach that focuses on “bang for buck” mitigations and targets hot spots. FFNZ considers that the amendments it proposes in its submission on</p>

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			AND AMEND to use more precise tests to work out where the pathogens are originating from, cattle, sheep, birds or humans etc.		<p>Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-catchment scale actions that are proportionate and tailored and prioritised.</p> <p>FFNZ supports a forensic approach that considers the issues in each sub-catchment and the implications for water quality. It supports an approach that identifies gaps in information and undertakes robust science or information gathering to address them. FFNZ does not support a forensic approach if it is used to allocate nitrogen or form an allocation or pre-determine an allocation approach.</p>
Mackenzie, David Stuart Submitter ID: 71695	PC1-3185	Policy 7	<p>RETAIN Policy 7</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.</p> <p>AND AMEND following Waikato Regional Council working collaboratively with stakeholder groups to develop sub-catchment management approach.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p> <p>The use “appropriate mitigation strategies “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p>

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Maihihi Farmers Group (Submitter 1-6) Submitter ID: 72604, 72598, 72602, 72600, 72606, 72590	PC1-2926 PC1-2882 PC1-2914 PC1-2899 PC1-2813 PC1-2936	Policy 7	RETAIN PPC1 as the only plan for now AND ENSURE that future additions to PPC1 are socially, economically and environmentally viable AND AMEND to discard current ideas based on Collaborative Stakeholder group modelling AND AMEND to include provisions that support new work over the 10 years of PPC1 to improve the science base and develop new mitigations to achieve the objectives AND AMEND so that agriculture is treated with as much importance as regionally significant industry AND AMEND so that farms around Tokoroa that should not have been allowed to be converted should be returned to native bush, and the farmers paid out at current market value for that land.	Support in part Oppose in part	FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable. FFNZ agrees that work needs to be done over the next 10 years to improve the science and develop new mitigations and technology to achieve the objectives (as amended by FFNZ's submission on Variation 1 including the removal of 80 year numeric targets and adoption of a narrative approach to achieving the values and V & S.) FFNZ agrees that more important ought to be given to the agriculture industry. FFNZ does not agree that this plan change should determine which farms should or should not have been converted and should therefore returned to native bush. However, FFNZ would support an approach that considers the use of incentives and other public funds to provide compensation where there is a public good.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9202	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will may be required by... that will assist in defining 'land suitability' preparing any <u>new allocation or management regime</u> c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will may consider the following criteria:..	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			c. the natural capacity of the landscape within a sub-catchment to attenuate contaminant loss; and..."		<p>FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable.</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p>
Matamata-Piako District Council Submitter ID: 73419	PC1-3497	Policy 7	<p>DELETE first paragraph of Policy 7 AND AMEND the sentence commencing 'Any future allocation should consider...' to incorporate the footnote. AND RETAIN clause 'c' that reads: 'Minimise social disruption and costs in the transition to the 'land suitability' approach' AND AMEND to reflect the matters taken into account in Policy 16 i-iii.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>It is not clear whether the submitter means the first paragraph or principle a. FFNZ sees merit in first paragraph as amended in FFNZ's submission. If it is to mean principle a, FFNZ considers that all principles ought to be deleted because FFNZ considers it is premature to allocate nitrogen or to lock in the principles for determining how that will occur. Furthermore, FFNZ considers the criteria in the footnote should also be deleted.</p> <p>FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable; however, FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p> <p>FFNZ considers that it is premature to allocate nitrogen or to lock the principles for nitrogen allocation decisions into this plan change while economic social and cultural benefits for tangata whenua may be a relevant factor to be considered in the future management of</p>

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					contaminants. FFNZ does not support the inclusion of the matters listed in Policy 16 i-iii.
Matira Sub Catchment Group Submitter ID: 74148	PC1-9295	Policy 7	DELETE Policy 7 in its entirety OR AMEND to provide a land use suitability and a sub-catchment method that would work better.	Support in part	<p>FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ also supports an approach that focuses on “bang for buck” mitigations and targets hot spots. FFNZ considers that the amendments it proposes in its submission on Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-catchment scale actions that are proportionate and tailored and prioritised.</p> <p>In the alternative, if FFNZ’s proposed amendments are not accepted, FFNZ supports the deletion of Policy 7.</p>
Maungatautari Marae Submitter ID: 73990	PC1-11736	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will may be required by... that will assist in	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support “any new allocation or management regime” as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>defining 'land suitability' <u>preparing any new allocation or management regime. ...</u></p> <p>c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..."</p> <p>AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria:..</p> <p>c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."</p>		<p>catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable.</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p>
Mayne, Anna Submitter ID: 72881	PC1-8985	Policy 7	<p>AMEND PPC1 to ensure the OVERSEER Model is not used for a regulatory purpose AND ENCOURAGE the use of the Overseer Report and the Nitrate Leaching Estimate as part of a Farm Environment Plan</p> <p>AND ADD a method that will support farmers to reduce application rates of artificial nitrogen and phosphorus to a flat rate (30-50kg/ha/year) over time</p> <p>AND ENSURE that Waikato Regional Council considers working collaboratively with Ngati Rangī O Te Oro and the holistic environmental accounting/monitoring tool that whanau/hapu have developed.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a "one-size fits all" approach is not appropriate and will not achieve sustainable management.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work. FFNZ considers that economic social and cultural benefits for tangata whenua may be a relevant factor to be considered in the future management of contaminants.
McAlister, James and Maeve Submitter ID: 72921	PC1-5827	Policy 7	DELETE Policy 7.	Support in part	FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In the alternative, if FFNZ's proposed amendments are not accepted, FFNZ supports the deletion of Policy 7.
McClunie, Joseph and Margaret Submitter ID: 71175	PC1-59	Policy 7	Policy 7: AMEND to include a clearly set out model of what this [farming] will look like after 80 years AND ADD a provision that if tree planting is required as part of the 80 year plan rather than farm land, that compensation will be provided AND AMEND to set aside the Nitrogen Reference Point and replace with an actual measurement on each farm.	Support in part Oppose in part	FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others. Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy

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					<p>working in combination with short and medium term targets which are achievable. As knowledge and robust scientific information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>FFNZ would support an approach that considers the use of incentives and other public funds to provide compensation where there is a public good.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ does not support allocation of contaminants to a property level and instead supports a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner.</p>
McLean, Parekawhia Submitter ID: 73359	PC1-11885	Policy 7	<p>AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will<u>may</u> be required by... that will assist in defining 'land suitability'<u>preparing any new allocation or management regime.</u> ...</p> <p>c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..."</p> <p>AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will<u>may</u> consider the following criteria:..</p> <p>c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable.</p>

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					FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).
Meier, Peter Submitter ID: 72622	PC1-9485	Policy 7	AMEND Policy 7 to ensure implementation plans are final, with clear standards and expectations to assist land owners with their future planning.	Oppose	FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ considers that it is premature to determine the future allocation regime. Similarly, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Furthermore seeks that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In the alternative, if FFNZ's proposed amendments are not accepted, FFNZ, unlike the submitter, seeks the deletion of Policy 7.
Miraka Limited Submitter ID: 73492	PC1-8821	Policy 7	AMEND Policy 7 wording to ensure that it is clear that the land suitability approach is not the starting point, but is one potential option subject to the Schedule 1 process once there is more detail for people to evaluate.	Support in part	FFNZ agrees that LUS should one potential option that is considered in 10 years time and subject to a Schedule 1 process. FFNZ considers that it is premature to make decisions about nitrogen allocation and that the merits of allocating nitrogen (and then if necessary how to allocate nitrogen) ought to be considered through engagement with the community and through a Schedule 1 process.
Neal, Craig Andrew Lamont and Tracey Anne Submitter ID: 73466	PC1-9029	Policy 7	DELETE the Nitrogen Reference Point and use of the OVERSEER Model from PPC1 in their entirety. AND AMEND to provide for a sub-catchment approach to addressing	Support in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>contaminants that are relevant to each farm.</p> <p>AND AMEND to use Farm Environment Plans to determine what would work best on each farm, and science to determine which contaminants are an issue in each sub-catchment.</p> <p>AND AMEND the rules so that they are science based, not based on grandparenting.</p>		<p>farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. For these reasons FFNZ agrees with the parts of the submission point that relate to removing a blanket restriction on nutrients that may not be an issue for the relevant sub-catchment.</p> <p>FFNZ also agrees that robust science is required and information gaps ought to be addressed. For this reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched.</p>

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Nelson Farms Partnership Submitter ID: 73054	PC1-8751	Policy 7	<p>DELETE the Nitrogen Reference Point from PPC1 AND DELETE the use of the OVERSEER Model from PPC1 AND AMEND to adopt a sub-catchment approach to addressing contaminants relevant to each farm AND AMEND so that, if nitrogen discharges do have to be allocated, the allocation system is based on the natural capital of soils and the water quality outcomes for each sub-catchment AND REMOVE allocation based on 2014/15 or 2015/16 land use or grandparenting, especially for lower leaching land uses such as drystock AND AMEND to use Farm Environment Plans to determine what works best for each farm, science to determine which contaminants are an issue in each sub-catchment, and effects-based provisions AND AMEND to reconsider the use of Overseer modelled nitrogen discharge numbers to determine resource consent status and compliance.</p>	<p>Support in part Oppose in part</p>	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number.</p> <p>FFNZ agrees with the submitter's proposal that there ought to be the ability to use models other than Overseer to estimate nitrogen where Overseer is not appropriate (e.g. there are mitigations that Overseer does not recognise) or changes to Overseer input standards. In its submission on Variation 1, FFNZ has proposed changes to the Schedules to provide for this.</p> <p>FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. For these reasons FFNZ does not agree with the submitter's request to delete the NRP but agrees about the use of Overseer.</p> <p>FFNZ disagrees with the submitter's point that those farms under 18 stock units should not have to obtain an NRP but only on the basis that the amendments it has proposed in its submission on Variation 1 are adopted i.e. flexibility is provided (particularly for those below a permitted baseline) to increase nitrogen in appropriate circumstances (and an appropriate consenting pathway is available).</p>

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					<p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. Similarly, FFNZ does not support the allocation of contaminants and considers that flexibility needs to be provided for land use change or intensification of activities or changes to farm systems where appropriate (and as provided for in the amendments attached to its submission on Variation 1).</p> <p>FFNZ does not agree with the submitter that nitrogen should be calculated on the basis of the natural capital of soils. FFNZ does not support nitrogen allocation. FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils. FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen (and if LUC is not used, there is no other reasonable proxy), there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm</p>

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					investment and land use. In terms of the NRP, FFNZ considers that the period for the benchmarking years needs to be changed and that there needs to be a reasonable pathway to increase nitrogen in appropriate circumstances. With these changes it would not be an allocation approach and would not be grand parenting.
New Zealand Forest Owners Association Inc Submitter ID: 73524	PC1-9958	Policy 7	RETAIN Policy 7. AND AMEND to include a clearer transition toward a non-grandparented approach to allocation within the life of PPC1 to create certainty for land users. AND make any consequential amendments.	Support in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.
Ngaati Tamaoho Trust Te Taiao Roopuu Submitter ID: 74088	PC1-11583	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria:.. c. the natural capacity of the landscape within a sub-catchment to attenuate contaminant loss; and..."	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point. FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable. FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).

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Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11835	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria:.. c. the natural capacity of the landscape within a sub-catchment to attenuate contaminant loss; and..."	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point. FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable. FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).
Nicholson, Chris and Vikki Submitter ID: 72447	PC1-3936	Policy 7	RETAIN the Policy 7 approach of reducing diffuse discharges while considering land suitability. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains, through a tailored Farm Environment Plan. AND AMEND to include provisions for Waikato Regional Council to work collaboratively with stakeholder groups to develop a sub-catchment management approach.	Support in part Oppose in part	FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed). The use "appropriate mitigation strategies" in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p>
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6423	Policy 7	AMEND Policy 7 by redrafting it as a Method, with amendments to clarify that future allocation will not be grandparented or based on existing use OR ADD a new policy/method drafted to adopt the alternative approach proposed in the submission [to regulate land use on the basis of the Best Practicable Option and work toward allocation on a land use suitability approach] and to provide the basis for collection of information and further research.	Support in part Oppose in part	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ does not support the deletion of the NRP provided it is used as a reference and is not to form the basis of any consideration of future allocation. For these reasons, FFNZ agrees with this submission point.</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed). For these reasons, FFNZ does not agree with this submission point.</p>
Oliver, William and Karen Submitter ID: 73021	PC1-7311	Policy 7	REMOVE Policy 7 (b).	Support in part	FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. On this basis agrees that paragraph b ought to be removed.
Osborne, Bob, Judy, Kim and Janette Submitter ID: 73249	PC1-9395	Policy 7	DELETE Policy 7(b).	Support in part	FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. On this basis agrees that paragraph b ought to be deleted.

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Pamu Farms of New Zealand Submitter ID: 74000	PC1-5940	Policy 7	AMEND Policy 7 to provide for amending the regional plan fertiliser application permitted activities to restrict phosphorus based fertiliser application only to the individual paddocks where industry recognised agronomic Olsen P levels are deficient, phosphorus need is demonstrated and suppliers bonded or liable for non-conforming release.	Oppose	<p>FFNZ does not support signalling future allocation not any contaminant in Policy 7. FFNZ has concerns that this submission point would effectively result in input controls and a “one-size fits all” approach to managing contaminants.</p> <p>FFNZ considers that it is premature to allocate nitrogen or any contaminant and considers that a tailored and proportionate sub-catchment approach out to be adopted for the management of contaminants from all sources including natural, pests, urban and rural.</p>
Parrott, Dorothy Fay, Peter Jack, Katherine and Conor Reeves Submitter ID: 73929	PC1-4965	Policy 7	<p>DELETE Policy 7 in its entirety. OR AMEND PPC1 where a re-notification process is begun when there are clear indications of what land use if required on every farm in the Waikato Region with any consequential amendments arising from the submission process. AND AMEND by developing a fair system of nutrient allocation for the Waikato Region that allows communities and catchments to develop solutions that work towards the outcomes required. The plan could be amended and re-notified once an effective system is devised with any consequential amendments arising from the submission process. AND AMEND by re-notifying only when there is a better system for measuring contaminant losses from farms, with any consequential amendments arising from the submission process. AND AMEND to ensure that PPC1 is adjusted to contain rules for the elimination of Koi Carp with any</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in</p>

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			<p>consequential amendments arising from the submission process. OR AMEND by re-notifying PPC1 once further thinking, research, consultation with affected parties and consideration has been given to what constitutes an effective, sustainable way forward, with any consequential amendments arising from the submission process.</p>		<p>each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. For these reasons FFNZ agrees with the parts of the submission point that relate to removing a blanket restriction on nutrients that may not be an issue for the relevant sub-catchment.</p> <p>FFNZ agrees that koi carp are a water quality issue and needs to be considered and addressed; however, FFNZ does not agree with more stringent targets or objectives being imposed on farmers and FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment.</p> <p>FFNZ also agrees that robust science is required and information gaps ought to be addressed. For this reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched.</p>
Parrott, Steven, Sandra, Alexander & Ulrika Submitter ID: 73750	PC1-5294	Policy 7	DELETE Policy 7 in its entirety AND REPLACE with an amended plan to provide for clear indications of what land use is required on a farm with any consequential amendments arising from the submission process AND DELETE the Nitrogen Reference Point requirement in its entirety AND AMEND to provide for rules for the elimination of koi carp with	Support in part Oppose in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			any consequential amendments arising from the submission process.		<p>the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p> <p>FFNZ agrees that koi carp are a water quality issue and needs to be considered and addressed; however, FFNZ does not agree with more stringent targets or objectives being imposed on farmers and FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment.</p>
Perfect Produce Co Ltd Submitter ID: 72488	PC1-4191	Policy 7	AMEND Policy 7 to recognise the polluter pays concept.	Oppose	<p>FFNZ considers that the 'polluter pays' principle is ambiguous. It is not clear how it would be applied, who would be affected and what the environmental, social, economic and cultural implications would be.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ also supports an approach that focuses on "bang for buck" mitigations and targets hot spots. FFNZ considers that the amendments it proposes in its submission on Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-</p>

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					<p>catchment scale actions that are proportionate and tailored and prioritised</p> <p>FFNZ does not support the allocation of nitrogen or an approach that is concerned with characterising certain farming activities as “high polluters” without consideration of particular characteristics or circumstances. FFNZ considers that its MPA framework provides for this.</p> <p>For these reasons FFNZ opposes this submission.</p>
Pickens and Tanneau, Craig and Julie Submitter ID: 74138	PC1-6595	Policy 7	AMEND Policy 7 by deleting 7 (b).	Support in part	FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. On this basis agrees that paragraph b ought to be deleted.
Pinnell, Graham Submitter ID: 74007	PC1-4428	Policy 7	DELETE Policy 7(b) and the last paragraph of Footnote 5. AND AMEND to clarify that an allocation system will consider biophysical, production, economic, good management practices and other relevant matters, but exclude grandparenting of existing use.	Support in part Oppose in part	<p>FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. On this basis agrees that paragraph b ought to be deleted.</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed). For this reason, FFNZ agrees with this submission point.</p> <p>FFNZ does not support any allocation system, however, FFNZ agrees that PC1 and any future</p>

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					plans ought to be socially, economically, and environmentally viable. Furthermore, FFNZ agrees on the submission point to exclude grandparenting.
Poohara Marae Submitter ID: 73545	PC1-12010	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria: c. the natural capacity of the landscape within a sub-catchment to attenuate contaminant loss; and..."	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point. FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable. FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).
Potini Whaanau Submitter ID: 74089	PC1-11686	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..."	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria:.. c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."		water quality issues then FFNZ supports this submission point. FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable. FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).
Pouakani Trust Submitter ID: 73785	PC1-6291	Policy 7	RETAIN Policy 7. AND AMEND the wording around land suitability approach such that it is clear that this is not the starting point, but is one potential option, subject to a first schedule RMA process once there is more detail for people to evaluate.	Support in part	FFNZ agrees that LUS should one potential option that is considered in 10 years time and subject to a Schedule 1 process. FFNZ considers that it is premature to make decisions about nitrogen allocation and that the merits of allocating nitrogen (and then if necessary how to allocate nitrogen) ought to be considered through engagement with the community and through a Schedule 1 process.
Primary Land Users Group Submitter ID: 71427	PC1-11153	Policy 7	AMEND Policy 7 to read: "Policy 7: Preparing for allocation in the future... <u>During stage 1, work collaboratively with relevant stakeholders and consented dischargers to develop a sub-catchment management approach to manage</u> Prepare for further diffuse discharge reductions and any future property or enterprise level allocation of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the policies and methods in this chapter. To assist this	Support in part Oppose in part	FFNZ supports the first part of the amendments i.e. sub-catchment management approach and assist this process by collecting information. However, it is opposed to allocation of nitrogen and to determining in this plan change that it is appropriate, necessary and that it should be based on LUS and the listed principles. For these reasons FFNZ does not agree with and therefore opposes the last part of the track changes this submitter proposes.

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			<p><u>process</u>, collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability <u>for a range of uses and allocation</u>.</p> <p>Any future aAllocation should consider the following principles..."</p>		
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7789	Policy 7	AMEND PPC1 to address sub-catchment management now rather than in the future and avoid establishing an allocation trading platform.	Support in part	<p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a "one-size fits all" approach is not appropriate and will not achieve sustainable management. For these reasons FFNZ agrees with the parts of the submission point that relate to removing a blanket restriction on nutrients that may not be an issue for the relevant sub-catchment.</p> <p>FFNZ does not support a trading regime because such a regime implies that contaminants will be allocated to a property, a property right created and FFNZ considers that it is not necessary or desirable to allocate contaminants.</p>
Pukerimu Farms Limited Submitter ID: 73073	PC1-4800	Policy 7	RETAIN Policy 7 but AMEND to include a clearer transition towards a non-grandparenting approach to allocation within the life of PPC1.	Support in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to

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					clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.
Purdie, Les and Helen Submitter ID: 71291	PC1-4937	Policy 7	AMEND Policy 7a principle for allocation to consider the economic impact conversion of sheep and beef land to forestry.	Support in part	FFNZ does not support the allocation of contaminants notwithstanding that, FFNZ agrees that if it was determined that allocation of nitrogen was necessary and appropriate, then the economic implications of conversion from any farming activity to forestry all the likely land use change associated with potential allocation regimes ought to be taken into account.
R.P O'Connor and Sons Ltd Submitter ID: 71651	PC1-6949	Policy 7	DELETE the use of the Nitrogen Reference Point and the use of the OVERSEER Model from PPC1 AND AMEND PPC1 to use a sub-catchment approach to address contaminants that are relevant to each farm AND use Farm Environment Plans to determine the best scenario for each farm, and science to determine which contaminants are an issue in each sub-catchment AND AMEND the rules so that they are not based on 'grandparenting'.	Support in part	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water</p>

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					<p>quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. For these reasons FFNZ agrees with the parts of the submission point that relate to removing a blanket restriction on nutrients that may not be an issue for the relevant sub-catchment.</p> <p>FFNZ also agrees that robust science is required and information gaps ought to be addressed. For this reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched.</p>
<p>Ramsay Baker, Mark and Cathy Submitter ID: 73608</p>	<p>PC1-8495</p>	<p>Policy 7</p>	<p>DELETE Policy 7, OR AMEND to model the effects of fencing, and what it will look like in 90 years. AND AMEND to set aside the Nitrogen Reference Point and deal with problems such as sediment.</p>	<p>Support in part</p>	<p>FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In the alternative, if FFNZ’s proposed amendments are not accepted, FFNZ supports the deletion of Policy 7.</p> <p>FFNZ considers that a consistent approach ought to be adopted across all four contaminants. FFNZ considers that a tailored and proportionate</p>

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					approach ought to be adopted to consider the “hot-spots” and particular water quality issues in each sub-catchment. FFNZ considers that it would be more appropriate to consider the role of sediment and any necessary management within this context.
Ransley, Adrienne Anne Submitter ID: 73763	PC1-6070	Policy 7	DELETE Policy 7 (b)	Support in part	FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. On this basis agrees that paragraph b ought to be deleted.
Ransley, Kelvin John Submitter ID: 73761	PC1-6059	Policy 7	DELETE Policy 7 (b)	Support in part	FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. On this basis agrees that paragraph b ought to be deleted.
Ratray, Earl Steven Submitter ID: 73528	PC1-6959	Policy 7	REMOVE from Policy 7 the reference to the concept of land suitability and any predetermined risk of utilising it.	Support	FFNZ agrees with this submission point as FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).
Raukawa Charitable Trust Submitter ID: 74073	PC1-10579	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will may be required by... that will assist in defining 'land suitability' preparing any new allocation or management regime. ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support “any new allocation or management regime” as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.

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			<p>suitability will<u>may</u> consider the following criteria:..</p> <p>c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."</p>		<p>FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable.</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p>
<p>Ravensdown Limited Submitter ID: 74058</p>	<p>PC1-10118</p>	<p>Policy 7</p>	<p>AMEND Policy 7 to retain the overall intent but reword for clarity and focus to read:</p> <p>"Prepare for further diffuse discharge reductions and any future property or enterprise-level allocation of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, <u>by</u> collecting information and <u>undertakeing</u> research to support this, including:</p> <ul style="list-style-type: none"> • Collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges; and • Researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment 	<p>Oppose in part</p>	<p>FFNZ agrees that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime.</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			that will assist in defining 'land suitability' (<u>refer to Schedule A</u>)." AND AMEND to include the detail regarding determining 'land suitability' in Schedule A.		
Reeves, John Submitter ID: 71201	PC1-879	Policy 7	AMEND Policy 7 to ensure all land owners and all New Zealanders in the Waikato and Waipā Catchments are treated equally and take responsibility for improving waterways.	Oppose in part	FFNZ supports a tailored and proportionate sub-catchment management approach with this process assisted by collecting information where the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a "one-size fits all" approach is not appropriate and will not achieve sustainable management.
Reeves and Taylor, James Gordon Livingston and Amy Louise Submitter ID: 71614	PC1-8536	Policy 7	AMEND Policy 7 to read: "...phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans <u>that may be required by subsequent regional plans to meet defined water quality objectives</u> , by implementing the policies..."	Support in part	FFNZ considers it is premature to allocate nitrogen. FFNZ agrees that changing the word "will" to "may" helps to signal that this is something that may happen as opposed to definitely happening, however, FFNZ's strong preference is that the policy is largely deleted and substantively amended as set out in its submission on Variation 1. FFNZ agrees that any consideration of future plan changes ought to be done in the context of agreed water policy objectives and is fundamental that any objectives are developed in contemplation of the community.
Roberts, Jessica Submitter ID: 74141	PC1-7172	Policy 7	RETAIN reducing diffuse discharges while considering land suitability. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made,	Support in part Oppose in part	FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			through a tailored Farm Environment Plan. AND AMEND to adopt a sub-catchment management approach, and work collaboratively with stakeholder groups to develop this.		The use “appropriate mitigation strategies “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point. FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.
Robson, Angus Submitter ID: 72479	PC1-4008	Policy 7	DELETE from Policy 7 references to allocation or benchmarking AND REPLACE with pollution levies based on outputs and the assimilative capacity of the land. AND establish a measuring system that is not the OVERSEER Model.	Support in part Oppose in part	FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed). FFNZ agrees with the submitter’s proposal that there ought to be the ability to use models other than Overseer to estimate nitrogen where Overseer is not appropriate (e.g. there are mitigations that Overseer does not recognise) or changes to Overseer input standards. In its submission on Variation 1, FFNZ has proposed changes to the Schedules to provide for this.
Rotorua Lakes Council Submitter ID: 73373	PC1-2505	Policy 7	AMEND Policy 7 to read as: <u>"Any future allocation should consider the following principles: a) Land suitability which reflects the natural capacity of the land based on its Land Use Capability class to attenuate contamination loss,</u>	Oppose	FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>other biophysical and climate properties, the risk of contaminant discharges from that land...</u>"</p> <p>AND MAKE any consequential amendments.</p>		<p>FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen (and if LUC is not used, there is no other reasonable proxy), there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use.</p> <p>For these reasons, FFNZ does not support this submission point.</p>
Rotor Work Limited Submitter ID: 73415	PC1-5965	Policy 7	<p>AMEND Policy 7 to set a fair nitrogen leaching loss limit of 30kg/N/ha for all farms and all farm types.</p> <p>AND AMEND to make provision for monitor more closely all farms above 30kg/N/ha</p> <p>AND AMEND provision so that farms above 30kg/N/ha incur costs if they continue above 30kg/N/ha.</p> <p>AND AMEND Policy 7 to reward low end dischargers.</p>	Oppose	<p>FFNZ considers that there is no reliable or equitable way to allocate nitrogen and no need to allocate nitrogen. FFNZ recognises a need for flexibility for low nitrogen emitters and considers this is better dealt with as set out in its submission on Variation 1.</p> <p>FFNZ does not support allocation of contaminants to a property level and instead supports a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ also supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					The submitter's proposal that all farmers receive 30kgN/ha is a form of allocation and FFNZ considers it will impose significant economic, social, cultural costs for no net environmental benefit. Therefore, it opposes the submission.
Rowe, Susan Helen Submitter ID: 72588	PC1-6740	Policy 7	REMOVE the requirements to be held at or below a properties Nitrogen Reference Point, especially for low discharging operations. AND AMEND PPC1 to adopt an alternative method to measure nitrogen such as one based on the natural capacity of soils.	Support in part Oppose in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils.
Ryan Farms Ltd Submitter ID: 73425	PC1-2261	Policy 7	AMEND Policy 7 to include sub-catchment plans.	Support	FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a "one-size fits all" approach is not appropriate and will not achieve sustainable management. For these reasons FFNZ agrees with this submission point.
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5703	Policy 7	REMOVE the use of allocations or benchmarking. (Policy 7) AND AMEND to use pollution levies based on the outputs above the assimilative capacity of land. AND REPLACE the use of OVERSEER with a measuring system that works.	Support in part Oppose in part	FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed). FFNZ agrees with the submitter's proposal that there ought to be the ability to use models other than Overseer to estimate nitrogen where Overseer is not appropriate (e.g. there are mitigations that Overseer does not recognise) or

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					changes to Overseer input standards. In its submission on Variation 1, FFNZ has proposed changes to the Schedules to provide for this.
Saxton, David Christopher Submitter ID: 73946	PC1-3356	Policy 7	DELETE the use of the Nitrogen Reference Point from PPC1. AND DELETE the use of the OVERSEER Model from PPC1.	Support in part	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p>
Scott, Neil, Ann, Brent and Louise Submitter ID: 73024	PC1-1814	Policy 7	AMEND Policy 7 by removing the grandparenting approach from the plan AND AMEND by providing a sub-catchment approach to address the contaminants that are relevant to each area rather than a blanket rule AND MAKE any consequential amendments.	Support	<p>FFNZ supports removing the grandparenting approach.</p> <p>FFNZ also supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. For these reasons</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					FFNZ agrees with the parts of the submission point that relate to removing a blanket restriction on nutrients that may not be an issue for the relevant sub-catchment.
Shaw and Hall, Leigh Michael and Bradley John Submitter ID: 73858	PC1-2618	Policy 7	RETAIN Policy 7 reducing diffuse discharges while considering land suitability. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan. AND ENSURE that Waikato Regional Council works collaboratively with stakeholder groups to develop sub-catchment approaches.	Support in part Oppose in part	FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed). The use “appropriate mitigation strategies “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point. FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.
Sherlock, Jon and Fiona Submitter ID: 73847	PC1-5038	Policy 7	WITHDRAW PPC1 and RE-NOTIFY once there is clear indication of future rules AND AMEND to make PPC1 less onerous on hill county farmers until future requirements become clear. For instance, only require stock to be excluded from slopes less than 15 degrees, as per the National Policy Statement for Freshwater Management	Oppose in part, support in part	FFNZ shares the submitters concerns with PPC1. There are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when setting the targets only c some values where considered while others were omitted. Having said that, FFNZ considers we should make a start on managing and/or reducing discharges at a sub-catchment level and start preparing for the possibility that mitigations or reductions may be required in future. For those

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND REMOVE the grandparenting approach AND AMEND so that nitrogen is investigated at a sub-catchment level AND AMEND to set a band that all dischargers have to adhere to, that is equitable for all low and high dischargers AND AMEND PPC1 to include rules to control koi carp.</p>		<p>reasons FFNZ does not want to abandon PPC1 but consider it requires substantive amendments.</p> <p>FFNZ agrees that Schedule C could be amended to ensure stock exclusion is affordable, practical and sustainable. FFNZ recommends improvements to Schedule C which are broadly:</p> <ul style="list-style-type: none"> - Linking the stock exclusion with stock units (18 or more per hectare); - Amending the dates and stages for stock exclusion; - Applying to water bodies that are subject of the Dairy Clean Streams Accord; - Allow for alternative mechanism through FEP that addresses issue. <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ agrees that koi carp are a water quality issue and needs to be considered and addressed; however, FFNZ does not agree with more stringent targets or objectives being</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>imposed on farmers and FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment.</p> <p>FFNZZ does not support a “band” approach. This implies the allocation of contaminants and/or the use of an arbitrary threshold to control contaminants. FFNZ instead supports a tailored approach that takes into account sub-catchment and farm characteristics.</p>
<p>Sherlock, Richard Submitter ID: 60407</p>	<p>PC1-10377</p>	<p>Policy 7</p>	<p>WITHDRAW PPC1 and re-notify once there is a clear indication of future rules AND AMEND Policy 7 to remove the grandparenting approach AND AMEND to manage nitrogen emissions at a sub-catchment scale, with levels set according to the sub-catchment issue AND AMEND to set an emission range for all properties to ensure equity across all emitters AND AMEND Policy 7 so that PPC1 provisions manage all factors which affect water quality.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports removing the grandparenting approach.</p> <p>FFNZ supports an approach that is consistent across a range of factors including farm types, urban and rural and across all four contaminants. FFNZ does not support the adoption of an emission range because that would involve allocating contaminants and a “one-size fits all” approach. FFNZ considers that a tailored and proportionate sub-catchment approach is superior and will result in lower social, economic and cultural costs as well as being more likely to achieve the desired environmental outcomes.</p> <p>FFNZ also supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. For these reasons</p>

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					FFNZ agrees with the parts of the submission point.
Sherriff and Tatham, Mathew and Kim Submitter ID: 72508	PC1-5626	Policy 7	DELETE Policy 7 Part b.	Support in part	FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. On this basis agrees that paragraph b ought to be deleted.
Sieling Farms Submitter ID: 73514	PC1-5465	Policy 7	DELETE Policy 7 in its entirety.	Support in part	FFNZ supports the part of Policy 7 which collates further information and research and believes that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime. Furthermore, FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. Similarly, FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In the alternative, if FFNZ's proposed amendments are not accepted, FFNZ supports the deletion of Policy 7.
Simpson, Greg John Submitter ID: 73225	PC1-5527	Policy 7	AMEND Policy 7 to be backed by a well-defined model that shows how the land and water will look in 90 years. Nitrogen Reference Point: AND AMEND to provide for the opportunity to use an effects based system to deal with the issues within each farm.	Oppose in part	FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 90 years when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others. Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short and medium

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>term targets which are achievable. As knowledge and robust scientific information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ does not support allocation of contaminants to a property level and instead supports a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner.</p> <p>FFNZ supports an effects based management regime.</p>
Simpson, Jennifer Submitter ID: 74145	PC1-9877	Policy 7	AMEND Policy 7 so it is modelled and will clearly set out what the land will be in 80 years' time. AND DELETE the use of a Nitrogen Reference Point from PPC1. AND AMEND PPC1 so that the effects of Nitrogen are addressed on a property basis.	Oppose in part	FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others. Instead FFNZ

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					<p>recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short and medium term targets which are achievable. As knowledge and robust scientific information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ does not support allocation of contaminants to a property level and instead supports a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner.</p>
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11103	Policy 7	AMEND Policy 7 to read: " Prepare for further diffuse discharge reductions and any future property or enterprise level allocation of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will be required by subsequent regional	Support in part Oppose in part	FFNZ agrees that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>plans, by implementing the policies and methods in this chapter. To ensure this occurs Collect information and undertake research for the purposes of developing future regional plan changes to support this, including information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'.</p> <p>Any future allocation should consider that following principles:</p> <p>a. Land suitability (5) which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e where the effect on the land and receiving waters will be the same, like land is treated the same for purposes of allocation); and</p> <p>b. Allowance for flexibility of development of tangata whenua ancestral land; and</p> <p>c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and</p> <p>d. Future allocation decisions should take advantage of new data and knowledge"</p>		<p>FFNZ considers that the last part of the final sentence ought to also be deleted because it is premature to determine that there will be allocation or that allocation will be based on LUS.</p> <p>FFNZ agrees that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles.</p>
South Waikato District Council Submitter ID: 72892	PC1-4044	Policy 7	DELETE the first paragraph of Policy 7 AND AMEND the sentence commencing 'Any future allocation should consider...' to incorporate the footnote.	Support in part	It is not clear whether the submitter means the first paragraph or principle a. FFNZ sees merit in first paragraph as amended in FFNZ's submission. If it is to mean principle a, FFNZ

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			AND RETAIN clause c. AND AMEND to ensure the matters listed under Policy 16 i-iii are consistent with and reflected in Policy 7.	Oppose in part	<p>considers that all principles ought to be deleted because FFNZ considers it is premature to allocate nitrogen or to lock in the principles for determining how that will occur. Furthermore, FFNZ considers the criteria in the footnote should also be deleted.</p> <p>FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable; however, FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p> <p>FFNZ considers that it is premature to allocate nitrogen or to lock the principles for nitrogen allocation decisions into this plan change while economic social and cultural benefits for tangata whenua may be a relevant factor to be considered in the future management of contaminants. FFNZ does not support the inclusion of the matters listed in Policy 16 i-iii.</p>
Stark, Steven and Theresa Submitter ID: 73721	PC1-5112	Policy 7	AMEND Policy 7 as follows: "Preparing for possible allocation in the future , any future allocation should consider the following principles:" DELETE Clause b) under Policy 7. AND AMEND Footnote 5 to read: " For the avoidance of doubt , Land suitability criteria exclude <u>include</u> current land use and current water quality, the moderating effects of potential mitigations and non-biophysical criteria (economic, social and cultural). Instead these factors	Oppose in part	<p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p> <p>FFNZ considers as knowledge and robust scientific information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>will be of importance in analysing the implications of a completed land suitability classification."</p> <p>AND AMEND by inserting the following to read:</p> <p>"d) Possible future allocation decisions should take advantage of new data and knowledge."</p>		
Stokes, Kelvin Arnold Submitter ID: 73748	PC1-5249	Policy 7	<p>With respect to Policy 7, provide a detailed model of the affect of PPC1 aspirations on all citizens and the impacts on their activities and businesses AND AMEND so that all citizens are aware they have a part to play AND AMEND so that towns and cities all brought to account in the same timeframe.</p> <p>With respect to Policy 7, DELETE Schedule B/Nitrogen Reference Point AND REPLACE with an effects based system that encourages farmers to address actual farm problems e.g. sediment runoff.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports an approach that is consistent across a range of factors including farm types, urban and rural and across all four contaminants.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ does not support allocation of contaminants to a property level and instead supports a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner.</p>
Stokes Shorthorn Farm Ltd Submitter ID: 73804	PC1-4051	Policy 7	<p>AMEND Policy 7 by providing a detailed model that clearly sets out the time frame between 0-80 years.</p> <p>AND AMEND by allowing the model to give expected outcomes as a result of the implementations made by the Council.</p> <p>AMEND Policy 7 by setting aside the Nitrogen Reference Point and provide a system which is effects based.</p>	Support in part	<p>FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others. Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND Policy 7 by addressing actual farming problems rather than a blanket approach.		<p>outcomes anticipated by the Vision & Strategy working in combination with short and medium term targets which are achievable. As knowledge and robust scientific information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ supports a targeted approach that targets those sub-catchments with the worst water quality issues or the contaminant that is of greatest issue as opposed to a blanket approach of reducing all contaminants everywhere.</p>
Strang and Strang Limited Submitter ID: 73851	PC1-5567	Policy 7	RETAIN Policy 7 AND AMEND to include a clearer transition toward a non-grandparented approach to allocation within the life of PPC1.	Support in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.
Sutherland Produce Ltd Submitter ID: 74155	PC1-7055	Policy 7	AMEND Policy 7 to recognise the polluter pays concept.	Oppose	<p>FFNZ considers that the 'polluter pays' principle is ambiguous. It is not clear how it would be applied, who would be affected and what the environmental, social, economic and cultural implications would be.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each</p>

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					<p>sub-catchment. FFNZ also supports an approach that focuses on “bang for buck” mitigations and targets hot spots. FFNZ considers that the amendments it proposes in its submission on Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-catchment scale actions that are proportionate and tailored and prioritised</p> <p>FFNZ does not support the allocation of nitrogen or an approach that is concerned with characterising certain farming activities as “high polluters” without consideration of particular characteristics or circumstances. FFNZ considers that its MPA framework provides for this.</p> <p>For these reasons FFNZ opposes this submission.</p>
Taupo District Council Submitter ID: 74207	PC1-8110	Policy 7	AMEND Policy 7 to ensure that further allocation systems and processes recognise the efforts made to reduce contaminants prior to PPC1, in a similar manner to that outlined in Policy 12.	Support in part	While FFNZ does not agree that Policy 7 should refer to future allocation (FFNZ does not support allocation of contaminants), it does agree that in managing contaminants, previous actions to reduce contaminants prior to PC1 ought to be taken into account and that point source and diffuse discharges should be treated equally and proportionately.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9353	Policy 7	DELETE from Policy 7 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.	Support in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ

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					proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11784	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria: c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point. FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable. FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).
Te Awamaarahi Marae Trustees Submitter ID: 74168	PC1-11972	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..."	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will<u>may</u> consider the following criteria:..</p> <p>c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."</p>		<p>water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable.</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p>
<p>Te Kauri Marae Submitter ID: 74124</p>	<p>PC1-11633</p>	<p>Policy 7</p>	<p>AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will<u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ...</p> <p>c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..."</p> <p>AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will<u>may</u> consider the following criteria:..</p> <p>c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable.</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p>

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Te Mata Group Ltd Submitter ID: 72978	PC1-4414	Policy 7	DELETE provisions enabling the use of Nitrogen Reference Points and The OVERSEER Model. Policy 7 AND AMEND to adopt a methodology that assesses on-farm contaminants and takes into account the terrain, farm policy and receiving environment relevant to the sub-catchment.	Support in part	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ does not support allocation of contaminants to a property level and instead supports a holistic sub-catchment approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner. FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p>
TerraCare Fertilisers Limited Submitter ID: 73066	PC1-10498	Policy 7	AMEND Policy 7 (d) to ensure a phosphate range in soil is readily measureable AND AMEND to provide for a more certain indication of potential for contamination than nitrate leaching in the OVERSEER Model AND AMEND to provide for the creation of an independent body to assess research on a value based basis and that	Support in part	FFNZ supports measures to close the currently gaps in understanding and knowledge to better manage contaminant loss. This is one of the reasons why FFNZ does not support the 80 years numeric targets (because of the gaps in data) and considers as knowledge and information becomes available better and more accurate targets can be progressively set to reach long term aims.

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			funding and information dissemination be assigned on that basis.		<p>FFNZ consider Overseer can still be used but as an on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). FFNZ considers the issue is when Overseer/NRP is used as benchmark, grandparenting of N or allocate N. FFNZ does not oppose NRP if it is simply used to indicate where farmers are at presently and as a trigger point for decisions on N increase eg. Permitted baseline for low emitters, controlled for middle emitters and restricted discretionary or discretionary for high emitters.</p> <p>FFNZ, supports a robust and independent science, but is unable to form a view on a proposal for an independent body because it is not clear what that would involve.</p>
Te Runanga o Ngati Kea Ngati Tuara Trust Submitter ID: 73543	PC1-12244	Policy 7	<p>AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime</u>. ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..."</p> <p>AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria:..</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			c. the natural capacity of the landscape within a sub-catchment to attenuate contaminant loss; and..."		FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable. FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).
Te Taniwha o Waikato Submitter ID: 73361	PC1-12060	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria: c. the natural capacity of the landscape within a sub-catchment to attenuate contaminant loss; and..."	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point. FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable. FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).
Te Whakakitenga o Waikato Incorporated (Waikato-Tainui)	PC1-7850	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in	Support in part	FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 74105			<p>defining 'land suitability' <u>preparing any new allocation or management regime.</u> ...</p> <p>c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..."</p> <p>AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria:..</p> <p>c. the natural capacity of the landscape within a sub-catchment to attenuate contaminant loss; and..."</p>	Oppose in part	<p>means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable.</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p>
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8259	Policy 7	DELETE Policies 7(b) and (c).	Support in part	FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. On this basis agrees that paragraphs b and c ought to be deleted.
The Worsp Family Trust Submitter ID: 73997	PC1-5079	Policy 7	DELETE Policy 7 provisions relating to long term land use and Nitrogen Reference Point. AND AMEND Policy 7 to consider all contributions to contaminant discharges including city storm water.	Support in part	FFNZ agrees that there needs to be an appropriate framework for generational improvement and for this reason it considers it premature to adopt 80 year numeric targets at this stage and it instead recommends a narrative approach based the values and Vision & Strategy. It is not clear what the submitter means by "delete long term land use provisions in Policy 7" but to the extent they are consistent with FFNZ's views, it supports the submission point.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>FFNZ does not agree that the NRP ought to be deleted but only on the basis that it is a reference point and not used to allocate nitrogen. FFNZ refers to its submission on Variation 1 and how it proposes the NRP is used (and in particular flexibility to increase nitrogen in appropriate circumstances).</p> <p>FFNZ supports an approach that is consistent across a range of factors including farm types, urban and rural and across all contaminants and regardless if it is point source or diffuse discharges.</p>
<p>Timberlands Limited Submitter ID: 73036</p>	<p>PC1-3323</p>	<p>Policy 7</p>	<p>DELETE Policy 7 and replace with: <u>"Collect information and undertake research about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and research the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'.</u> <u>Any future regulation should consider the following principles:</u> <u>a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation);</u></p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that the focus of Policy 7 ought to be on collating further information and undertaking research. FFNZ agrees that it is premature to determine the future allocation regime.</p> <p>FFNZ considers that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles.</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p> <p>FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>b. Future regulation decisions should take advantage of new data and knowledge."</u>		
Tirohanga Settlers and Sports Association Submitter ID: 71751	PC1-7097	Policy 7	AMEND Policy 7 to treat everyone the same AND AMEND Policy 7 so that any future activity that could affect the four contaminants of the river is publicly notified.	Support in part	FFNZ supports an approach that is consistent across a range of factors including farm types, urban and rural and across all four contaminants.
Trustees of Highfield Deer Park Submitter ID: 73932	PC1-3963	Policy 7	AMEND Policy 7 by incorporating land suitability criteria into the first paragraph. AND AMEND to provide an exception to the criteria where outcomes may undermine the financial viability of a farming unit.	Oppose in part Support in part	FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed). For these reasons FFNZ does not agree with this submission point. The submitter's concerns appear to be that the effects on economic and community wellbeing has not been appropriately considered when setting the numeric attribute states. If this is correct, FFNZ shares these concerns and seeks that financial viability for a farm be appropriately considered.
Tucker, Geoff and Kara Submitter ID: 73928	PC1-2770	Policy 7	DELETE the Nitrogen Reference Point in Policy 7. AND DELETE the use of the OVERSEER Model from PPC1. AND ADOPT a sub-catchment approach based on Farm Environment plans, using science to determine which contaminants are an issue in that catchment.	Support in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. For these reasons FFNZ agrees with the parts of the submission point that relate to removing a blanket restriction on nutrients that may not be an issue for the relevant sub-catchment.</p> <p>FFNZ also agrees that robust science is required and information gaps ought to be addressed. For this reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched.</p>
Turangawaewae Marae Submitter ID: 74173	PC1-12182	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any</u> new allocation or management regime. ...		FFNZ does not support any type of allocation and therefore does not support “any new allocation or management regime” as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..."</p> <p>AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria:..</p> <p>c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."</p>		<p>each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable.</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p>
<p>Tuwharetoa Maori Trust Board Submitter ID: 73356</p>	<p>PC1-10301</p>	<p>Policy 7</p>	<p>AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ...</p> <p>c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..."</p> <p>AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria:..</p> <p>c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable.</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					nitrogen and its merits for allocation are not able to be assessed).
Twining, Murray Ian and Robyn Joy Submitter ID: 72587	PC1-6788	Policy 7	RETAIN the Policy 7 approach of reducing diffuse discharges while considering land suitability. AND AMEND PPC1 to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan. AND AMEND so Waikato Regional Council to work collaboratively with stakeholder groups to develop sub-catchment management approach.	Support in part Oppose in part	FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed). The use “appropriate mitigation strategies “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point. FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.
Verkerk, Gwyneth Submitter ID: 60476	PC1-1274	Policy 7	Invest in soil science to better understand the processes of nitrogen attenuation in the region's soils. Policy 7 AND future rules are put in place to ensure that the nature of the farming activity is appropriate to the land.	Oppose in part	FFNZ considers that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work. FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed). Similarly, FFNZ considers that this is not appropriate for reasons including that LUC is not a proxy for nitrogen (and if LUC is not

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					used, there is no other reasonable proxy), there is no reliable or equitable basis to allocate nitrogen or to measure nitrogen discharges, the environmental outcomes are uncertain and could be worse, and allocating nitrogen on the basis of LUC will impose significant economic, social and cultural costs on the society as well as give windfall gains and fail to recognise existing capital and on farm investment and land use. For these reasons FFNZ does not agree with this submission point.
Verry, Adrian Submitter ID: 73810	PC1-2474	Policy 7	DELETE from Policy 7 the Nitrogen grandparenting rule.	Support	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future. For these reasons FFNZ supports this submission.
Verry, Reon and Wendy Submitter ID: 72887	PC1-3801	Policy 7	DELETE Policy 7b.	Support in part	FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. On this basis agrees that paragraph b ought to be deleted.
Waahi Pa Marae Committee Submitter ID: 73751	PC1-12121	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will may be required by... that will assist in defining 'land suitability' preparing any new allocation or management regime. ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			suitability will <u>may</u> consider the following criteria: c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."		FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable. FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).
Waahi Whaanui Trust Submitter ID: 73537	PC1-11960	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria: c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point. FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable. FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).
Waiawa Farms Submitter ID: 71346	PC1-5813	Policy 7	AMEND Policy 7 to include a clearer transition toward a non-grandparented	Support in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			approach to allocation within the life of PPC1 to create certainty for land users.		FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3320	Policy 7	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and any future property or... pathogens that will <u>may</u> be required by... that will assist in defining 'land suitability' <u>preparing any new allocation or management regime.</u> ... c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria: c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."	Support in part Oppose in part	FFNZ does not support any type of allocation and therefore does not support "any new allocation or management regime" as put forward in this submission. In the alternative, if the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point. FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable. FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).
Waikato Dairy Leaders Group Submitter ID: 74049	PC1-10944	Policy 7	RETAIN the provisions of PPC1 that are proactive in anticipating the sorts of information needed to reduce contaminant reductions and achieve Objective 1 AND AMEND Policy 7 to read: " <u>Identify and fill information gaps</u> to prepare for further diffuse discharge reductions and any future property or enterprise-level allocation <u>limits</u> of diffuse	Support in part	FFNZ agrees that robust science is required and information gaps ought to be addressed. For this reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched. FFNZ agrees that the focus of Policy 7 ought to be on collating further information and undertaking research. Similarly, FFNZ considers

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>discharges of nitrogen, phosphorus, sediment and microbial pathogens that will <u>may</u> be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, <u>research will be undertaken in partnership with technical and industry organisations in a manner that allows people and communities to understand the social, environmental, cultural and economic implications of the current plan, and engage in debate about any future limits.</u> collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'.</p> <p>AND RETAIN wording in PPC1 that subsequent plan changes will be subject to the full public process of the RMA First Schedule, and will enable all those within the Waipā and Waikato River catchments to fully participate.</p>		<p>that it is premature to determine the future allocation regime.</p> <p>FFNZ agrees that PC1 and any future plans ought to be socially, economically, and environmentally viable.</p> <p>FFNZ supports that the last part of the final sentence ought to also be deleted because it is premature to determine that there will be allocation or that allocation will be based on LUS.</p> <p>FFNZ considers that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles.</p>
<p>Waikato Environment Centre Submitter ID: 73436</p>	<p>PC1-6236</p>	<p>Policy 7</p>	<p>AMEND Policy 7 to recognise the potential off-sets to the costs of change, and the potential economic benefits, that will assist in limiting any social disruption.</p>	<p>Support in part</p>	<p>While FFNZ considers that the principles for future allocation ought to be deleted from Policy 7, it agrees that the future management of contaminants ought to recognise the impact on the economic, social and cultural wellbeing of the community. FFNZ considers that the social and economic costs are going to be significant</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					already and in future and supports any provisions that can assist with offsetting, mitigating the costs of change.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11347	Policy 7	<p>AMEND Policy 7 to read: "Preparing for allocation in the future <u>Through the Stage 1 period, engage with key stakeholders and resource users to determine a sub-catchment approach to actively manage</u> Prepare for further diffuse discharge reductions and any future property or enterprise-level allocation of diffuse discharges for adoption into enterprise based sub-catchment management consents of nitrogen phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs support this engagement, Waikato Regional Council will collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools adaptive management and mitigation approaches (including Decision Support Tools) to estimate contaminant discharges, and researching the spatial variability of land use...that will assist in defining 'land suitability' for allocation. ... d. Future allocation decisions should take advantage of new data and knowledge. <u>d. Allow the flexibility for discharges to move between uses and increase</u></p>	Support in part Oppose in part	<p>FFNZ considers that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. For these reasons FFNZ agrees with the parts of the submission point that relate to removing a blanket restriction on nutrients that may not be an issue for the relevant sub-catchment.</p> <p>It is not clear what is meant by “adaptive management.” The intention appears to be that provision is made for review and amendment as more information becomes available. FFNZ would support such an approach. FFNZ would not support an adaptive management approach if it meant taking a cautious approach (i.e. being more conservative in targets or more restrictive in controlling activities) until more or better information is available.</p> <p>FFNZ does not support the allocation of contaminants and considers that flexibility needs to be provided for land use change or intensification of activities or changes to farm</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>incentives for efficient land use; and</u> <u>e. Apply an equitable base allocation in standardised amounts for discharges to land, that is a proportion of the available resource; and</u> <u>f. The ability to respond to changing environmental circumstances; and</u> <u>g. In accordance with Te Mana o Te Wai Encourage enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change - where an adaptive management and mitigation approach for the sub-catchment provides information and monitoring results that can define 'land suitability' consistent with the principles for allocation during the current plan period."</u>		<p>systems where appropriate (and as provided for in the amendments attached to its submission on Variation 1).</p> <p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p>
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2112	Policy 7	DELETE Policy 7 reference to land suitability and REPLACE with 'future allocation method.' AND DELETE Footnote 5. AND AMEND Policy 7(c) to read as follows: "Minimise <u>economic hardship</u> and social disruption and costs in the transition..."	Support in part	<p>FFNZ considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p> <p>FFNZ agrees that Footnote 5 ought to be deleted.</p> <p>FFNZ considers that paragraphs a-d ought to be deleted because it is premature to decide that there will be allocation and that it will be based on these principles. In principle FFNZ agrees that management of contaminants ought to minimise economic hardship.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Wai Shing Ltd Submitter ID: 73069	PC1-2270	Policy 7	AMEND the principles in Policy 7 to allow for a polluter pays concept.	Oppose	<p>FFNZ considers that the ‘polluter pays’ principle is ambiguous. It is not clear how it would be applied, who would be affected and what the environmental, social, economic and cultural implications would be.</p> <p>FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ also supports an approach that focuses on “bang for buck” mitigations and targets hot spots. FFNZ considers that the amendments it proposes in its submission on Variation 1 achieve that through a regulatory and non-regulatory approach to FEPs and sub-catchment scale actions that are proportionate and tailored and prioritised</p> <p>FFNZ does not support the allocation of nitrogen or an approach that is concerned with characterising certain farming activities as “high polluters” without consideration of particular characteristics or circumstances. FFNZ considers that its MPA framework provides for this.</p> <p>For these reasons FFNZ opposes this submission.</p>
Walker, Richard Submitter ID: 73919	PC1-6727	Policy 7	<p>RETAIN the Policy 7 reduction of diffuse discharges while considering land suitability</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND to have Waikato Regional Council work collaboratively with stakeholder groups to develop a sub-catchment management approach.		<p>The use “appropriate mitigation strategies “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p>
Walter, Philip Submitter ID: 71194	PC1-6615	Policy 7	AMEND Policy 7 to include a statement that future rules on 'land suitability' will be based on sound science.	Oppose in part	FFNZ does not support this submission because FFNZ does not support any type of allocation regime, however, FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work. FFNZ considers that the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).
Walter and Doran, Peter Alan Susan and Casey Submitter ID: 73078	PC1-9119	Policy 7	DELETE the use of OVERSEER for obtaining the Nitrogen Reference Point. AND REPLACE with soil types and stock class to find the amount of nitrogen the soil can hold before leaching. AND AMEND to use sub-catchments to identify the amount of nitrogen loss and amount of nitrogen to be applied through scientific evidence not a grandparenting approach.		<p>FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number.</p> <p>FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND so that farms not exceeding the 75th percentile can work on nitrogen applications for accumulating 5 year average.		also opposes any mechanism to allocate based on natural capital of soils. FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. Furthermore, FFNZ does not support the grandparenting approach to nitrogen allocation.
Ward, Bruce Submitter ID: 73286	PC1-7285	Policy 7	DELETE the reference to 'modelling tools' from Policy 7. AND AMEND PPC1 so that, where necessary, the government provides compensation to retire and destock land. DELETE Policy 7b.	Support in part	FFNZ does not have an issue with the term "modelling tools" as long as that is not coupled with a regime that allocates contaminants. FFNZ considers that modelling can help to understand water quality issues and inform appropriate mitigations. However, the limitations with any modelling need to be acknowledged and its use needs to be limited to decision support. FFNZ would support an approach that considers the use of incentives and other public funds to provide compensation where there is a public good. FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. On this basis agrees that paragraph b ought to be deleted.
Ward-Allen, William Alec Submitter ID: 74147	PC1-9872	Policy 7	AMEND Policy 7 to REMOVE the need to establish a Nitrogen Reference Point.	Support in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p>
<p>Waterworth, Bruce Kenrick Submitter ID: 71442</p>	<p>PC1-2523</p>	<p>Policy 7</p>	<p>RETAIN Policy 7 the Nitrogen Reference Point calculation. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment. AND AMEND to apply flexibility of development to all land equally.</p>	<p>Oppose in part</p>	<p>FFNZ supports the use of the NRP as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. Furthermore, FFNZ does</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>not support the grandparenting approach to nitrogen allocation.</p> <p>FFNZ does not support the transport or trading of the NRP because that implies that the NRP is being used to allocated nitrogen and FFNZ does not support nitrogen allocation. However, FFNZ does see merit in considering off-setting options.</p> <p>FFNZ supports an approach that is consistent across a range of factors including farm types, urban and rural and across all four contaminants.</p>
Waterworth, Jenefer Fay Submitter ID: 71438	PC1-1534	Policy 7	DELETE Policy 7b so that all land is treated the same.	Support in part	FFNZ seeks the deletion of all the principles in paragraphs a-d because FFNZ considers it is premature to allocated nitrogen or to lock in the principles for determining how that will occur. Furthermore, FFNZ supports an approach that is consistent across a range of factors including farm types, urban and rural and across all four contaminants. On this basis agrees that paragraph b ought to be deleted.
Waterworth, Lewis Bruce Submitter ID: 71444	PC1-1509	Policy 7	<p>DELETE the provision AND AMEND Policy 7 to a land use change policy that covers the whole of Waikato and Waipā River catchments and applies to all land equally.</p> <p>RETAIN the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year.</p> <p>RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point.</p> <p>RETAIN that the 75th percentile leaching value includes the dairy sector.</p>	Oppose in part	FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.		<p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p> <p>FFNZ does not support the transport or trading of the NRP because that implies that the NRP is being used to allocated nitrogen and FFNZ does not support nitrogen allocation. However, FFNZ does see merit in considering off-setting options.</p>
Waterworth, Serena Submitter ID: 71437	PC1-8565	Policy 7	RETAIN Policy 7, AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.	Oppose in part	FFNZ does not support the transport or trading of the NRP because that implies that the NRP is being used to allocated nitrogen and FFNZ does not support nitrogen allocation. However, FFNZ does see merit in considering off-setting options.
Wildman, Anna Mary Submitter ID: 72505	PC1-3875	Policy 7	<p>DELETE from Policy 7 the Nitrogen Reference Point AND REPLACE with the use of Farm Environment Plans as the primary tool to manage nutrient losses. Nitrogen Reference Points should be used to support the Farm Environment Plans and farms with high emission should still be required to reduce their nutrient losses</p> <p>AND more work should be done on addressing contaminant loss through a sub-catchment approach including increased use of technology and water monitoring to support the identification of sub-catchment issues.</p>	Support in part	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p> <p>FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues. FFNZ considers that a “one-size fits all” approach is not appropriate and will not achieve sustainable management. FFNZ agrees that robust science and the increased use of technology is required and information gaps ought to be addressed. For this reason, FFNZ proposes a new paragraph b to Policy 7 to clarify the information that will be collated and amendments to paragraph c to clarify what needs to be researched.</p>
Williamson, Jack Submitter ID: 72769	PC1-8922	Policy 7	AMEND to extend the reference period for Nitrogen Reference Points AND REMOVE the use of the OVERSEER Model to calculate Nitrogen Reference Points.	Support in part	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).
Williamson, Stephen David Submitter ID: 73040	PC1-8669	Policy 7	DELETE Policy 7 requirements for farms to be held at or below a property's Nitrogen Reference Point, especially for low discharging operations AND DELETE the use of the OVERSEER Model AND, if an allocation of nitrogen discharges is needed, base the allocation on the natural capacity of soils and not on existing land uses.	Support in part Oppose in part	<p>FFNZ supports the use of the NRP as a reference point and as long as it is not used to grandparent and therefore allocate nitrogen. Similarly, FFNZ supports the use of Overseer as a means of calculating the NRP and as an on farm decision support tool where appropriate. However, FFNZ has concerns about the use of Overseer in allocating nitrogen and monitoring compliance with an allocated number. FFNZ proposes that Policy 7 is amended to clarify that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</p> <p>For these reasons FFNZ does not agree with the submission point but only on the proviso that the NRP and Overseer are used as FFNZ proposes in its submission on Variation 1 (and Policy 7 clarifies that the NRP is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future).</p> <p>FFNZ opposes the use of LUC to set nitrogen limits or targets or to allocate nitrogen. FFNZ also opposes any mechanism to allocate based on natural capital of soils.</p>
Williamson, Terry Submitter ID: 71228	PC1-778	Policy 7	Provide an 80-year model to bring some reassurance to the agriculture industry. AND AMEND Policy 7(b) to provide the same rule for all.	Oppose in part	FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>of the targets only considers some values but omits considering others. Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short and medium term targets which are achievable. As knowledge and robust scientific information becomes available better and more accurate targets can be progressively set to reach the long term aim.</p> <p>FFNZ supports an approach that is consistent across a range of factors including farm types, urban and rural and across all four contaminants.</p>
Woodacre Partnership Submitter ID: 67313	PC1-4227	Policy 7	<p>RETAIN Policy 7 reduction of diffuse discharges while considering land suitability</p> <p>AND AMEND Policy 7 by enabling appropriate water quality mitigation strategies to be adopted through tailored Farm Environment Plans</p> <p>AND AMEND to ensure Waikato Regional Council works collaboratively with stakeholder groups to develop a sub-catchment management approach.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ does not support the first point. It considers the principles for allocation and reference to LUS ought to be deleted because it is premature to put this into the plan; LUS is still a high level concept (not available to manage nitrogen and its merits for allocation are not able to be assessed).</p> <p>The use “appropriate mitigation strategies “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point.</p> <p>FFNZ agrees that a collaborative approach involving all relevant stakeholders and supported by robust science and technical assistance ought to be adopted for future work.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Woods, Paula and Ken Submitter ID: 73806	PC1-2458	Policy 7	AMEND Policy 7 by implementing a longer time period that is workable.	Support in part	FFNZ does not consider it is helpful to lock in long term numeric targets to be achieved in 80 years when, inter alia, there are issues with the underlying assumptions when setting the targets, issues with the basis of analysis, gap in understanding and knowledge, when the setting of the targets only considers some values but omits considering others. Instead FFNZ recommends adopting a set of narrative targets for the long term to achieve the water quality outcomes anticipated by the Vision & Strategy working in combination with short and medium term targets which are achievable. As knowledge and robust scientific information becomes available better and more accurate targets can be progressively set to reach the long term aim. For these reasons, FFNZ agrees with this submission point.
Worsp, Simon Wynn & Rosemary Elizabeth Submitter ID: 71269	PC1-929	Policy 7	DELETE Policy 7 provisions relating to long term land use and Nitrogen Reference Point. AND AMEND to contain rules for Koi Carp elimination and measurement of all contributions to contaminant discharges including city storm water.	Support in part Oppose in part	FFNZ agrees that there needs to be an appropriate framework for generational improvement and for this reason it considers it premature to adopt 80 year numeric targets at this stage and it instead recommends a narrative approach based the values and Vision & Strategy. It is not clear what the submitter means by “delete long term land use provisions in Policy 7” but to the extent they are consistent with FFNZ’s views, it supports the submission point. FFNZ agrees that koi carp are a water quality issue and needs to be considered and addressed; however, FFNZ does not agree with more stringent targets or objectives being imposed on farmers and FFNZ supports an approach that is consistent across a range of

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					factors including farm types, urban and rural and across all four contaminants.
Yule, Don, Lauris and Yvette Submitter ID: 73096	PC1-11534	Policy 7	RETAIN Policy 7 Policy 7: AMEND PPC1 to enable appropriate mitigation strategies through tailored Farm Environment Plans AND REQUIRE the Council to work collaboratively with stakeholder groups to develop sub-catchment management approaches.	Support in part Oppose in part	The use “appropriate mitigation strategies “in this submission point are ambiguous. If the submitter means to adopt a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues then FFNZ supports this submission point. FFNZ supports a tailored and proportionate sub-catchment approach that considers the issues in each sub-catchment and the contributors to water quality issues, tailors actions in the FEPs in a proportionate way to the particular sub-catchment water quality issues.
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-12374	Policy 8	AMEND Policy 8 and subsequent rules relating to the 75th percentile, to provide for the 50th percentile nitrogen leaching value to be prioritised for Farm Environment Plans and in Matters of Control in consideration of resource consents.	Oppose	FFNZ promotes provisions that require those who discharge above 75 th percentile to reduce to the 75 th percentile as part of its framework as set out in FFNZ’s submission on Variation 1. FFNZ considers a 50 th percentile is too severe a target and would cause a disproportionate diminishing of economic, cultural and social wellbeing of the community.
A S Wilcox & Sons Ltd Submitter ID: 73142	PC1-4315	Policy 8	AMEND Policy 8 to enable management of horticultural enterprises between sub-catchments, OR ADD another policy to enable this.	Support in part	In general FFNZ supports enterprises (not just horticulture all other activities to which the same applies) being able to operate between sub-catchment. However such provisions may be complex and controversial and until FFNZ sees

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					the particulars of the relief sought FFNZ can only support it in principle but reserves its position.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11492	Policy 8	AMEND Policy 8 to require reductions of Nitrogen greater than the currently proposed 75th percentile. AND AMEND to introduce appropriate sub-catchment contaminant numerical limits to enable targeted and prioritised actions. AND AMEND to prioritise the establishment of catchment collaborative groups based on priority sub-catchments.	Oppose in part, support in part	<p>In principle, FFNZ supports provisions that require those who discharge above 75th percentile to reduce to the 75th percentile as part of its framework as set out in FFNZ's submission on Variation 1. FFNZ considers a greater reduction percentile will be too severe and would cause a disproportionate diminishing of economic, cultural and social wellbeing of the community.</p> <p>FFNZ's submissions to Variation 1 seeks a change to policy 8 to clarify that it is the 10 year water quality targets in Objective 3 that are assessed for prioritisation and not the 80 year targets. FFNZ will require further information on the "appropriate sub-catchment contaminant numeric limits" provisions. If it is a means to allocate contaminants then FFNZ will likely not support it.</p> <p>FFNZ supports sub-catchment groups with group action plans to improve water quality in the sub-catchment. However, it has concerns about an approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives.</p>
Buckley, Peter Ross Submitter ID: 71423	PC1-1410	Policy 8	RETAIN Policy 8.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets.
Cameron, Bruce Submitter ID: 60603	PC1-6348	Policy 8	RETAIN Policy 8 with altered priority catchments as proposed in PPC1.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Charion Investment Trust Submitter ID: 71344	PC1-7757	Policy 8	DELETE Policy 8 and all associated rules.	Oppose	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10783	Policy 8	RETAIN Policy 8 as currently worded.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets.
Department of Conservation Submitter ID: 71759	PC1-10670	Policy 8	AMEND Policy 8 in a way that would see all wetland and lake sub-catchments being included as Priority 1 in Table 3.11-2.	Oppose in part	FFNZ has concerns with the method of prioritisation. FFNZ is concerned that the prioritisation methodology appears to have focused on ranking sub-catchments as opposed to looking at absolute distances from targets or water quality issues (and not just for Nitrogen). The submitters amendments do not address those concerns. Having said that, FFNZ agrees that Whangamarino Wetland should be prioritised.
FarmRight Submitter ID: 73720	PC1-5393	Policy 8	RETAIN Policy 8.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9794	Policy 8	AMEND Policy 8 to read: "In addition to the priority sub-catchments listed in Table 3.11-2, <u>the properties which exceed the 75th percentile nitrogen leaching value</u> dischargers <u>discharges</u> will also be prioritised for <u>the completion and implementation of</u> Farm Environment Plans."	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.
Fletcher Trust Submitter ID: 73848	PC1-5949	Policy 8	DELETE Policy 8 and all associated rules.	Oppose	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets.

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Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10489	Policy 8	DELETE Policy 8. AND AMEND PPC1 so that all activities with an obligation to prepare and submit a Farm Environment Plan be required to do so by 1 July 2020.	Oppose	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets. FFNZ considers that a prioritised approach ought to be adopted (for the date of FEPs) for reasons including that there are unlikely to be sufficient CFEPs to carry out all FEPs by 2020 and targeted and prioritised hot spot approach is more likely to result in the greatest water quality improvements for the lowest cost. See FFNZ's submission on Variation 1 on Rule 3.11.5.3 for the FFNZ's proposed dates for FEPs.
Fulton Hogan Limited Submitter ID: 74048	PC1-10867	Policy 8	AMEND Policy 8(a) to read: "a. Sub-catchments where there is a greater gap between the <u>desired</u> water quality targets <u>states</u> ^ in Objective 1 (Table 3.11-1) and current water quality; and..."	Support in part	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity. However FFNZ does not support reference to the long term objectives rather it considers it should be the desired short term water quality states.
GBC Winstone Submitter ID: 73992	PC1-3609	Policy 8	AMEND Policy 8 as follows: "a. Sub-catchments where there is a greater gap between the <u>desired</u> water quality targets <u>states</u> ^ in Objective 1..."	Support in part	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity. However FFNZ does not support reference to the long term objectives rather it considers it should be the desired short term water quality states.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5665	Policy 8	AMEND Policy 8 to be consistent with the proposed amendments to the rules within this submission [Best Practicable Option approach].	Oppose	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality amongst other reasons.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Hill Country Farmers Group Submitter ID: 73321	PC1-7750	Policy 8	AMEND Policy 8 to include sub-catchment plans for four contaminants based on current and specific data.	Support	FFNZ supports sub-catchment plans and the use of best science.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10075	Policy 8	AMEND Policy 8 to enable the management of horticultural enterprises between sub-catchments to recognise there will be a minimal overall variance in proportion of vegetable cropping across all enterprises in each sub-catchment.	Support in part	In general FFNZ supports enterprises (not just horticulture but all other activities to which the same applies) being able to operate between sub-catchment. However such provisions may be complex and controversial and until FFNZ sees the particulars of the relief sought FFNZ can only support it in principle and reserves its position until the specified relief sought is available.
King Country Energy Limited Submitter ID: 60693	PC1-7842	Policy 8	RETAIN Policy 8 and make amendments to recognise other equally important criteria for prioritising implementation AND MAKE any similar amendments with like effect AND MAKE any consequential amendments.	Oppose in part	FFNZ also has concerns with the method of prioritisation. FFNZ is concerned that the prioritisation methodology appears to have focused on ranking sub-catchments as opposed to looking at absolute distances from targets or water quality issues (and not just for Nitrogen). The submitters have not provided proposed amendments so FFNZ does not know if the relief sought by the submitter will address those concerns.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-9950	Policy 8	RETAIN Policy 8.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9209	Policy 8	RETAIN Policy 8.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets.
Matamata-Piako District Council Submitter ID: 73419	PC1-3501	Policy 8	AMEND Policy 8 to remove the uncertainty over interpretation and application of its provisions.	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.

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Mercury NZ Limited Submitter ID: 73182	PC1-9541	Policy 8	<p>AMEND Policy 8 to read: "Prioritise the m Management of land and water resources will be required in all sub-catchments by implementing Policies 1, 2, 3 and 9. Policy implementation will be prioritised in accordance with the priority rank set out in Table 3.11-2 for each sub-catchment, inclusive of Lakes Freshwater Management Units within the mapped sub-catchment. and in accordance with the prioritisation of areas set out in Table 3.11-2. Priority areas include:</p> <p>a. Sub-catchments where there is a greater gap between the water quality targets in Objective 1 (Table 3.11-1) and current water quality; and b. Lakes Freshwater Management Units; and</p> <p>In addition to the priority sub-catchments listed in Table 3.11-2, the 75th percentile nitrogen leaching value dischargers will also be prioritised for Farm Environment Plans."</p>	Oppose in part	<p>If FFNZ proposed relief for policy 1 is accepted as set out in FFNZ's submission to Variation 1 then FFNZ will support inclusion of policy 1, else it will oppose it.</p> <p>FFNZ does not agree with the submitter's prioritisation. FFNZ is concerned that the prioritisation methodology appears to have focused on ranking sub-catchments as opposed to looking at absolute distances from targets or water quality issues (and not just for Nitrogen).</p>
Miraka Limited Submitter ID: 73492	PC1-8822	Policy 8	<p>REMOVE prioritisation of sub-catchments in relation to implementation policies to achieve water quality improvements, but potentially retain in relation to allocation of council staff and resources, planning and funding AND DELETE prioritisation of 75th percentile nitrogen leaching dischargers.</p>	Oppose	<p>FFNZ supports prioritisation of sub-catchments (policy 8) subject to some amendments so that priorities are based on the size of the gap to achieve the short term targets.</p> <p>FFNZ supports provisions that require those who discharge above 75th percentile to reduce to the 75th percentile as part of its framework as set out in FFNZ's submission on Variation 1.</p>
New Zealand Pork Industry Board	PC1-4620	Policy 8	RETAIN Policy 8.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73780					
New Zealand Steel Ltd Submitter ID: 73790	PC1-3706	Policy 8	RETAIN Policy 8.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11836	Policy 8	RETAIN Policy 8.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6424	Policy 8	AMEND Policy 8 so that it is consistent with the alternative approach proposed in the submission.	Oppose	FFNZ opposes the submitter's alternative approach.
Primary Land Users Group Submitter ID: 71427	PC1-11155	Policy 8	AMEND Policy 8 to confirm the basis for the 75th percentile AND AMEND to provide clear guidance on the interpretation as requiring land managers to avoid, remedy or mitigate the adverse effects of their activities.	Support in part	FFNZ supports provisions that require those who discharge above 75 th percentile to reduce to the 75 th percentile as part of its framework as set out in FFNZ supports making provisions clear and certain for plan users by removing any ambiguity. FFNZ's submission on Variation 1.
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7795	Policy 8	RETAIN the Policy 8 prioritisation approach, with clarification on how sub-catchments are prioritised AND AMEND to enable horticultural enterprises to manage diffuse discharges between sub-catchments.	Support in part	FFNZ supports prioritisation but also has concerns with the method of prioritisation. FFNZ is concerned that the prioritisation methodology appears to have focused on ranking sub-catchments as opposed to looking at absolute distances from targets or water quality issues (and not just for Nitrogen).
Raukawa Charitable Trust Submitter ID: 74073	PC1-10590	Policy 8	RETAIN Policy 8.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets
Ravensdown Limited Submitter ID: 74058	PC1-10119	Policy 8	RETAIN the intent of Policy 8. AND AMEND last paragraph of Policy 8 to be clearer and more focussed, with the following changes:	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>"Prioritise the management of land and water resources by implementing the Policies 2,3 and 9, and in this plan in accordance with the prioritisation of areas..."</p> <p>"In addition to the priority sub-catchments listed in Table 3.11-2, the properties that exceed the 75th Percentile nitrogen leaching value dischargers will also be prioritised for the completion and implementation of Farm Environment Plans."</p>		
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11104	Policy 8	<p>AMEND Policy 8 to read: <u>"In addition to implementing Policies 2, 3 and 9,"</u> prioritise the management of land and water resources <u>"in the short term to 2026"</u> "by implementing Policies 2, 3 and 9, and" in accordance with the prioritisation of areas set out in Table 3.11-2...</p>	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets.
South Waikato District Council Submitter ID: 72892	PC1-4046	Policy 8	AMEND Policy 8 to remove the uncertainty over interpretation and application of its provisions.	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity
Stark, Steven and Theresa Submitter ID: 73721	PC1-5124	Policy 8	<p>DELETE Policy 8 in its entirety. AMEND Policy 8 by DELETING Table 3.11-1 by replacing the minimum standards as set out in the Ministry for Environment's Clean Water document published February 2017, publication number ME 1293.</p>	Oppose in part	<p>FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets.</p> <p>The submitter did not provide particulars on the recommendations in the government's clean water document and how it would be adopted and joined with the proposed provisions in the plan. In regards to stock exclusion FFNZ considers the that stock exclusion based on a slope criteria is too uncertain and requiring all stock to be excluded form all water bodies will impose significant cost</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					for no net benefit. In regards to other recommendations without further particulars from the submitter FFNZ opposes adopting the recommendations amongst other reasons because there has been no evaluation whether the recommendations are the most appropriate way to achieve the objectives of PC1 and values of the Vision & Strategy nor have FFNZ been provided with details of the scale and significance of the environmental, economic, social and cultural effects on the Waikato region.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11785	Policy 8	RETAIN Policy 8.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10308	Policy 8	RETAIN Policy 8.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3337	Policy 8	RETAIN Policy 8.	Support in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets
Waikato Regional Council Submitter ID: 72890	PC1-3058	Policy 8	AMEND Policy 8, last sentence to read: "In addition to the Priority 1 sub-catchments listed in Table 3.11-2, the 75th percentile"	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11348	Policy 8	ADD the following paragraph to Policy 8: " <u>Providing for enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change, in advance of the priority dates and events in Rule 3.11.5.4 and Table 3.11-2 will positively assist in</u>	Oppose	FFNZ opposes global resource consents or an approach that gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ's concerns include that this may devolve power to a particular group, may not result in water quality improvements and may impose significant cost.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>achieving a tailored approach to sub-catchment mitigation and implementing Policies 2 and 9."</u>		
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2113	Policy 8	AMEND Policy 8 to replace prioritisation with the requirement that all farms submit and adhere to a Farm Environment Plan by 1st July 2020. AND DELETE reference to the 75th percentile nitrogen leaching value. AND AMEND sub-catchments to be defined by physical attributes.	Oppose in part	FFNZ supports Policy 8 subject to some amendments so that priorities are based on the size of the gap to short term targets. FFNZ supports provisions that require those who discharge above 75 th percentile to reduce to the 75 th percentile as part of its framework as set out in FFNZ's submission on Variation 1.
A S Wilcox & Sons Ltd Submitter ID: 73142	PC1-4316	Policy 9	AMEND Policy 9 to enable offsetting where it can be demonstrated that there will be a commensurate effect on the restoration of the health and well-being of the Waikato River AND AMEND to enable a consenting pathway for groups to take responsibility for contaminant reductions through catchment and paddock scale mitigations that are able to be measured and reported.	Support	FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1) but do not consider offset has to be commensurating. FFNZ considers that contaminants are more appropriately targeted at a sub-catchment level rather than on a property basis. FFNZ supports sub-catchment groups with group action plans to improve water quality in the sub-catchment. However, it has concerns about an approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ's concerns include that this may devolve power to
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11493	Policy 9	RETAIN Policy 9 AND AMEND to facilitate and support the establishment and operation of sub-catchment groups to manage water quality and biodiversity issues facing a sub-catchment, providing innovative and, where required, edge of field mitigation, and which facilitates flexible, viable	Support in part, oppose in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute to management of discharges. FFNZ supports sub-catchment groups with group action plans to improve water quality in the sub-catchment. However, it has concerns about an

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>businesses and communities, and enables transfer of resources such as nutrients within the assimilative capacity of soils and water, and at sustainable levels.</p> <p>AND AMEND to give effect to new collaborative catchment objectives.</p> <p>AND AMEND to incorporate Policy 17 provisions in relation to recognition, support and enhancement of biodiversity values.</p> <p>AND AMEND PPC1 to include a new Method which provides for Regional Council support of catchment groups and approaches to addressing complex land and water management issues, including sub-catchment specific studies, data collection, catchment group facilitation, development and funding of sub-catchment models which support catchment groups, decision making and consenting.</p>		<p>approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ's concerns include that this may devolve power to a particular group, may not result in water quality improvements and may impose significant cost. FFNZ does not support an allocation approach based on natural capital (and hence also a transfer of resource based on allocation) FFNZ does not support the inclusion of biodiversity and considers provisions should focus on water quality and contaminants. FFNZ supports edge of field mitigation. FFNZ opposes the adoption of 'sustainable level' as it uses LUC as method to allocate Nitrogen/ contaminants and accordingly FFNZ also opposes the proposed transfer of resource (because means allocation that FFNZ opposes and the use of LUC for allocation).</p> <p>FFNZ supports the establishment of sub-catchment groups but considers this needs to be non-regulatory (and not compulsory) and considers that this should not involve the devolution of power or allocation of contaminants to sub-catchments.</p> <p>FFNZ does not support the inclusion of biodiversity and considers provisions should focus on water quality and contaminants</p> <p>FFNZ supports a new method which provides for Regional Council support of catchment groups and sub-catchment specific studies, data collection, catchment group facilitation, development and funding of sub-catchment</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					models which support catchment groups. However FFNZ opposes an approach that provides global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives.
Buckley, Peter Ross Submitter ID: 71423	PC1-1411	Policy 9	RETAIN Policy 9 managing water quality on a sub-catchment level AND AMEND the rules to reflect Policy 1 and Policy 9 AND AMEND to enable appropriate mitigation strategies to be adopted through a tailored Farm Environment Plan.	Support in part	If FFNZ's relief for policies 1 and 9 is accepted then FFNZ will support amendments to reflect these policies else it opposes such amendments . FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.
Cameron, Bruce Submitter ID: 60603	PC1-6350	Policy 9	RETAIN Policy 9 AND AMEND PPC1 to reflect Policy 1 and 9 AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute. If FFNZ's relief for policies 1 and 9 is accepted then FFNZ will support amendments to reflect these policies else it opposes such amendments . FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.
Charion Investment Trust Submitter ID: 71344	PC1-7758	Policy 9	DELETE Policy 9 AND AMEND Policy 2 and all associated Rules as required to incorporate the intent of Policy 9.	Oppose	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10784	Policy 9	RETAIN Policy 9 with amendments to specify the timeframes for implementation of the cost effective mitigations.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute. FFNZ consider timeframes are best done on a case by case basis for sub-catchments.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
DairyNZ Submitter ID: 74050	PC1-10237	Policy 9	RETAIN Policy 9 AND AMEND to clarify that identifying spatial location of mitigations in sub-catchment plans, will inform what is required of dairy farmers in Farm Environment Plans. AND ADD a NEW clause (e) to read: <u>“e. Where landowners contribute to mitigations as set out in c – d., to recognise this contribution through funding assistance and formal and enduring mechanisms that give the community and the landowner confidence that improvements in water quality are achieved.”</u>	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute. FFNZ also support recognising improvements and landowners obtainig funding assistance. FFNZ’s concerns with “formal and enduring mechanism” is that it seems inflexible and regulatory. FFNZ will need to see the particular proposed mechanism before it can support inclusion of this phrase.
Department of Conservation Submitter ID: 71759	PC1-10671	Policy 9	AMEND Policy 9 to clarify the support that the policy intends to provide for efficient and effective water quality improvements. AND AMEND to read: “...edge of field mitigation measures. Support measures that efficiently and effectively contribute to water quality improvements. this approach includes:...” AND AMEND to achieve greater clarification on what form engagement will take and a timeframe for when this can be expected to occur for each priority area category. AND REPLACE use of the word "mitigations" with "mitigation measures" in Policy 9. AND AMEND clause (c) to ensure that those mitigation measures with the greatest environmental outcomes are prioritised and acknowledging that this	Oppose	FFNZ supports assistance being provided for efficient and effective water quality improvements and according oppose the deletions proposed. FFNZ consider for a policy further clarification is not necessary. FFNZ supports changing mitigations with mitigation measures only if the term mitigations is ambiguous. FFNZ supports the current proposed wording of policy 9 c) and consider that the submitters proposed wording will contradict cost effective mitigations as is proposed. FFNZ oppose amendments to policy 9d) as proposed by the submitter as it opposes allocation to each farming enterprise.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			could require high cost options to achieve desired outcomes. AND AMEND clause (d) by replacing "a mitigation" with "mitigation measure(s)". AND AMEND clause (d) to achieve greater certainty around how this section will be achieved and the methodology that Council intends to apportion diffuse discharge reductions to each farming enterprise.		
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9795	Policy 9	RETAIN Policy 9.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
Fletcher Trust Submitter ID: 73848	PC1-5951	Policy 9	DELETE Policy 9 and AMEND Policy 2 as required and all associated rules.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10490	Policy 9	ADD the following advisory note at the end of Policy 9: <u>"Advisory note: Policy 9 applies in addition to, and not as an alternative to, other policies of section 3.11.3 of this plan. It is to be given effect to through the implementation of Method 3.11.4.5."</u>	Support	FFNZ supports the clarification in the advisory note.
Fonterra Shareholders Council Submitter ID: 72610	PC1-10640	Policy 9	AMEND Policy 9 to ADD a notification which states that Policy 9 applies in addition to, and not as an alternative to, other policies of section 3.11.3 of this plan.	Support	FFNZ supports the clarification in the advisory note.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5684	Policy 9	AMEND Policy 9 by specifying the timeframes for implementation of the cost effective mitigations.	Oppose	FFNZ considers the timeframes are better decided on a case by case basis.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
<p>Horticulture New Zealand (HortNZ) Submitter ID: 73801</p>	<p>PC1-10078</p>	<p>Policy 9</p>	<p>AMEND Policy 9 to read: "Policy 9: Sub-catchment (including edge of field) mitigation planning, coordination and funding/Te Kaupapa Here 9: Te whakarite mahi whakangāwari, mahi ngātahi me te pūtea mō te riu kōawāwa (tae atu ki ngā taitapa) Take a prioritised and integrated approach to sub-catchment water quality management by undertaking sub-catchment planning, and use this planning to support actions including <u>edge of field mitigation measures and catchment collective responses</u>. Support measures that efficiently and effectively contribute to water quality improvements. This approach includes: a. Engaging early with tangata whenua and with landowners, communities and potential funding partners in sub-catchments in line with the priority areas listed in Table 3.11-2; and b. Assessing the reasons for current water quality and sources of contaminant discharge, at various scales in a sub-catchment; and c. Encouraging cost-effective mitigations where they have the biggest effect on improving water quality; and <u>da. Enable the collaborative management of discharges at a scale greater than a single farm and provide a consenting pathway for groups that form to take responsibility for contaminant reductions by implementing a combination of catchment and paddock scale mitigations</u></p>	<p>Oppose in part Support in part</p>	<p>FFNZ supports sub-catchment groups with group action plans to improve water quality in the subcatchment. However, it opposes global consents or gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ's concerns include that this may devolve power to a particular group, may not result in water quality improvements and may impose significant cost.</p> <p>FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>that are able to be measured and reported.</u></p> <p>d. Allowing, where multiple farming enterprises contribute to a mitigation, for the resultant reduction in diffuse discharges to be apportioned to each enterprise in accordance with their respective contribution to the mitigation and their respective responsibility for the ongoing management of the mitigation.</p> <p><u>e. Provide for offsetting where it can be demonstrated there will be a commensurate effect on the restoration of the health and well-being of the Waikato River."</u></p>		
King Country Energy Limited Submitter ID: 60693	PC1-7876	Policy 9	RETAIN Policy 9. AND MAKE any similar amendments with like effect. AND MAKE any consequential amendments.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
Lakes and Waterways Action Group Trust (LWAG) Submitter ID: 53342	PC1-4074	Policy 9	AMEND Policy 9 to make specific references to incentivising tree planting e.g. through the uptake of the Government's fund for freshwater improvement.	Support in part	FFNZ supports provisions that enable funding to assist with water quality improvements.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-9951	Policy 9	RETAIN Policy 9.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9210	Policy 9	RETAIN Policy 9.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
Matamata-Piako District Council	PC1-3503	Policy 9	AMEND Policy 9 'a' to read: "Engaging early with <u>local authorities</u> , tangata	Support in part	FFNZ agrees that local authorities should also be engaged with by the regional council.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73419			whenua and with land owners, communities..."		
Miraka Limited Submitter ID: 73492	PC1-8823	Policy 9	ADD Policy 9(e) to read as follows: " <u>Providing Best Practice management guidelines and examples of cost-effective mitigations that have the biggest effect on improving water quality across a range of farming policies, land types and other biophysical factors, to be included in the Farm Environment Plans and applied on all properties and enterprises in the region.</u> "	Oppose in part	FFNZ considers the bar of “best management practice management” is too high and ought to be industry agreed GMP or MPA. FFNZproposes tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ’s submission on Variation 1.
New Zealand Steel Ltd Submitter ID: 73790	PC1-3708	Policy 9	RETAIN Policy 9.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11837	Policy 9	RETAIN Policy 9.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6425	Policy 9	RETAIN Policy 9 AND AMEND Policy 9 by clarifying the basis and timeframes for implementing cost effective mitigation strategies. AND AMEND by providing reference to the Best Practicable Options. AND DELETE Policy 9 Clause d). IF the proposed amendments are not accepted then AMEND Policy 9 so that it is consistent with the alternative approach proposed in the submission. OR IF the alternative approach is not accepted, AMEND to require strategies/mitigations to be implemented using Farm Environment Plans.	Oppose	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute. FFNZ proposes tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ’s submission on Variation 1. Timeframes will be tailored in the FEPs. FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					controls and is likely to be inflexible, impractical cause significant cost, not address water quality amongst other reasons.
Pamu Farms of New Zealand Submitter ID: 74000	PC1-5755	Policy 9	ADD to Policy 9 clear storm water detention/treatment criteria. AND ADD paddock design criteria for contaminant detention/treatment. Consider the 10 percent AEP 48 hour event, or similar.	Oppose in part	FFNZ have concerns that the numeric attribute states do not take into account or provide for anomalies or spikes e.g. flood or other unforeseeable events that is not a trend. FFNZ consider that the numeric targets ought to be amended to reasonably provide for this. However it is unclear the criteria that the submitter is seeking to be added to the policy 9 for storm water detention/treatment or paddock design considering the 10% AEP 48 event. Accordingly FFNZ cannot support its inclusion in policy 9.
Primary Land Users Group Submitter ID: 71427	PC1-11156	Policy 9	AMEND PPC1 to ensure the rules give effect to Policy 9.	Oppose	FFNZ considers that Policy 9 should be given effect to through the implementation of Method 3.11.4.5 and 3.11.4.5A as set out in FFNZ's submission on Variation 1.
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7798	Policy 9	RETAIN the Policy 9 sub-catchment management approach AND AMEND to reflect collective management of diffuse discharges beyond the boundary on a sub-catchment basis.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute. FFNZ supports sub-catchment groups with group action plans to improve water quality in the sub-catchment and even beyond the boundaries of the sub-catchment.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10547	Policy 9	RETAIN Policy 9.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
Ravensdown Limited Submitter ID: 74058	PC1-10120	Policy 9	RETAIN the intent of Policy 9 as it is currently written.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Reeve, Jocelyn Margaret Submitter ID: 73109	PC1-9986	Policy 9	AMEND Policy 9 as follows: "Take a prioritised and integrated approach to sub-catchment water quality management by undertaking sub-catchment planning <u>to be completed at least four years prior to the date the Farm Environment Plan is due in accordance with sub-catchment priorities.</u> and Use this planning to support actions..."	Support in part	FFNZ will support any wording that will indicate that sub-catchment planning should be prioritised as contaminants are more appropriately targeted at a sub-catchment level.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11106	Policy 9	No specific decision sought for Policy 9.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
South Waikato District Council Submitter ID: 72892	PC1-4055	Policy 9	AMEND Policy 9(a) to read: "Engaging early with <u>local authorities</u> , tangata whenua and with land owners, communities..."	Support	FFNZ agrees that local authorities should also be engaged with by the regional council.
Taupo District Council Submitter ID: 74207	PC1-8111	Policy 9	RETAIN the intent of Policy 9 AND AMEND to ensure that the required funding is provided to enable the effective implementation of Policy 9.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11786	Policy 9	RETAIN Policy 9.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8253	Policy 9	AMEND to ensure that actions such as edge of field mitigation measures are included in rule standards, matters of control and discretion and Farm Environment Plans AND DELETE Policy 9(d).	Oppose in part	FFNZ supports edge of field mitigations and other mitigation actions but do not consider it should be part of rules rather it should be implemented through methods 3.11.4.5 and 3.11.4.5A as set out in FFNZ's submission on Variation 1. FFNZ supports policy 9d) subject to minor amendments to clarify that it is whole of catchment that need to contribute.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10311	Policy 9	RETAIN Policy 9.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3340	Policy 9	RETAIN Policy 9.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
Waikato Regional Council Submitter ID: 72890	PC1-3060	Policy 9	RETAIN Policy 9.	Support in part	FFNZ supports policy 9 subject to minor amendments to clarify that it is whole of catchment that need to contribute.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11349	Policy 9	ADD the following paragraph to Policy 9: <u>"Encouraging enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change, will provide a key method (alongside participation in any relevant Certified Industry Schemes) for achieving clear and enduring improvements in water quality by implementing adaptive management and mitigation measures In accordance with Policy 6(c)."</u>	Oppose in part	FFNZ opposes global resource consents or an approach that gives sub-catchment groups governance rights or that allocates contaminants to sub-catchment collectives. FFNZ's concerns include that this may devolve power to a particular group, may not result in water quality improvements and may impose significant cost.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2115	Policy 9	ADD to Policy 9 a provision 'e' to read as follows: <u>"Providing Best Practice Management guidelines and examples of cost effective mitigations that have the biggest effect on improving water quality across a range of farming policies, land types and other biophysical factors, to be included in Farm Environment Plans and applied on properties and enterprises in the region."</u>	Oppose in part	FFNZ considers the bar of "best management practice management" is too high and ought to be industry agreed GMP or MPA. FFNZproposes tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Waitomo District Council Submitter ID: 73688	PC1-10323	Policy 9	AMEND Policy 9 and Method 3.11.4.5 to make the development of sub-catchment plans a high priority implementation item OR ADD a NEW sub-catchment management policy to make the development of sub-catchment plans a high priority implementation item AND AMEND to focus sub-catchment plan development and implementation on Priority 1 sub-catchments first. AND AMEND to include working closely with territorial authorities in the development of sub-catchment plans AND AMEND to promote sub-catchment plans that deliver broader benefits than individual property compliance.	Support in part	FFNZ will support any wording that will indicate that sub-catchment planning should be prioritised as contaminants are more appropriately targeted at a sub-catchment level. FFNZ also agree that territorial authorities should be engaged in sub-catchments.
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-9580	Policy 10	AMEND Policy 10 to make it clear that policies 11 and 12 apply to discharges under Policy 10. AND AMEND Policy 10, 11 and 12 to strengthen in terms of urban centres.	Support	FFNZ's fundamental principles is seeking consistency in approach between point source and diffuse discharges; urban and rural.
AFFCO New Zealand Limited Submitter ID: 74140	PC1-7514	Policy 10	AMEND the definition of Point source discharge/s to read as follows: "For the purposes of Chapter 3.11, means discharges from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems." AND ADD a definition for regionally significant industry to read as follows: <u>"Regionally significant industry - means industry based on the use of natural and physical resources in the region which</u>	Support	FFNZ agrees that it is still point source discharge regardless whether or not the discharge has consent. FFNZ also agrees that a definition for regionally significant industry would provide more certainty.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes:</p> <p>a) dairy manufacturing sites; b) meat processing plants and rendering plants; c) wood processing plants; and c) mineral extraction activities."</p>		
BT Mining Ltd Submitter ID: 72453	PC1-9920	Policy 10	<p>AMEND Policy 10 to read "...provide for the:</p> <p>(a) Continued operation of regionally significant infrastructure <u>and regionally significant industry;</u> (b) Continued operation of regionally significant industry <u>The growth of regionally significant infrastructure and regionally significant industry;</u> (c) <u>The establishment of new regionally significant infrastructure and regionally significant industry.</u>"</p>	Oppose in part	FFNZ acknowledges the need to provide for the continued operation of regionally significant infrastructure and industry. It considers that new and growth in regionally significant infrastructure and industry should not be without qualification or without regard to effects on water quality.
Cameron, Bruce Submitter ID: 60603	PC1-6352	Policy 10	<p>RETAIN Policy 10. AND AMEND PPC1 to include all sources influencing the health and well-being of the Waikato River and catchments, including pest fish species, point sources and hydro dams. AND ADOPT a sub-catchment approach to ensure collaborative and fair management of resources within each sub-catchment.</p>	Support in part	<p>One of FFNZ's fundamental principles is consistency in approach between point source and diffuse discharges; urban and rural. FFNZ agrees that pest species need to be managed to improve water quality. FFNZ also agree that national or regional significant hydro dams should look at reducing effects on water quality. FFNZ supports a sub-catchment approach and sub-catchment groups with group action plans to improve water quality in the sub-catchment.</p>
Contact Energy Limited	PC1-7376	Policy 10	RETAIN Policy 10.	Support in part	FFNZ supports and recognition the importance of regionally significant infrastructure and industry. However, it considers policy 10 needs to be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73714					amended to ensure that it is not without qualification.
Department of Conservation Submitter ID: 71759	PC1-10676	Policy 10	AMEND Policy 10 to ensure that point source discharges are undertaken in a manner that recognises and provides for the values of individual water bodies. AND AMEND PPC1 so that point source discharges are considered as part of a land-based allocation regime. OR AMEND to ensure that the achievement of water quality goals is considered when processing consent applications for point source discharges. AND provide a definition for 'regionally significant industry'.	Support in part Oppose in part	FFNZ agrees that regionally significant industry and infrastructure still has to contribute to management of water quality. FFNZ opposes the use of a land based regime as mechanism or method to allocate contaminants. Amongst other reasons, FFNZ oppose allocation and it was not designed for contaminant leaching and as a result the relationship between land based regime and contaminants is unreliable. FFNZ also agrees that a definition for regionally significant industry would provide more certainty
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9796	Policy 10	AMEND Policy 10 to read: "Provide for point source discharges of regionally significant infrastructure and industry "	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.
Fletcher Trust Submitter ID: 73848	PC1-5995	Policy 10	ADD to Policy 10 the following sub-paragraph (c): " <u>Continued operation of associated farming operations and their economic benefit to the region/sub-catchment.</u> "	Support in part	FFNZ agrees that operations associated with farming can be of regional or national significance.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10598	Policy 10	AMEND Policy 10 to read: "Policy 10: Provide for Point Source Discharge <u>from activities</u> of regional significance/.... When deciding resource consent applications for Point Source Discharge of nitrogen, phosphorus, sediment and microbial pathogens to water or onto or into land, <u>subject to Policy 11 and Policy 12</u> , provide for the:..."	Support	FFNZ agrees with amendments that clarifies the provision and that clarifies that existing regionally significant industry and infrastructure is still subject to policy 11 and 12.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Fulton Hogan Limited Submitter ID: 74048	PC1-10744	Policy 10	AMEND Policy 10 to read: "Policy 10: Provide for point source discharges <u>from activities</u> of regional significance/Te Kaupapa..." AND AMEND Policy 10 to read: "...pathogens to water or onto or into land, <u>subject to Policy 11 and Policy 12</u> , provide for the: a. continued operation <u>and development</u> of regionally significant infrastructure; and b. continued operation <u>and development</u> of regionally significant industry."	Support in part	FFNZ agrees with amendments that clarifies the provision and that clarifies that existing regionally significant industry and infrastructure is still subject to policy 11 and 12.
GBC Winstone Submitter ID: 73992	PC1-2883	Policy 10	AMEND Policy 10 to read: "...Provide for point source discharges <u>from activities</u> of regional significance... microbial pathogens to water or onto or into land, <u>subject to Policy 11 and 12</u> provide for the: a) Continued operation <u>and development</u> of regionally... b) Continued operation <u>and development</u> of regionally..."	Support in part	FFNZ agrees with amendments that clarifies the provision and that clarifies that existing regionally significant industry and infrastructure is still subject to policy 11 and 12.
Genesis Energy Limited Submitter ID: 74052	PC1-8799	Policy 10	RETAIN Policy 10 and the Regional Policy Statement definitions of 'regionally significant infrastructure' and 'regionally significant industry'.	Support in part	FFNZ supports and recognition the importance of regionally significant infrastructure and industry. However, it considers policy 10 need to be amended to ensure that it is not without qualification. FFNZ considers that the definitions would provide more certainty.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Graymont (NZ) Limited Submitter ID: 73954	PC1-2841	Policy 10	AMEND Policy 10 to ADD the words: " <u>c. Continued operation of existing quarrying and mining industry activities that are associated with the extraction and manufacture of products from natural resources and that due to geophysical constraints, are unable to be relocated out of the catchment.</u> "	Oppose in part	FFNZ considers that there should be consistency in approach and existing quarrying and mining should still have to contribute be it through adopting BPOs.
Hamilton City Council Submitter ID: 74051	PC1-10755	Policy 10	AMEND Policy 10 to include a new provision to read: " <u>c. Continued operation of regionally significant infrastructure associated with the provision of municipal water supply, wastewater and storm water services, including where this is in response to growth in urban development to give effect to the Waikato Regional Policy Statement.</u> "	Oppose in part	FFNZ considers that rather than adopting a new sub-paragraph c. if that infrastructure is nationally or regional significant then it should be included in the definition as such.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5692	Policy 10	AMEND to strengthen Policy 10.	Oppose	FFNZ supports and recognition the importance of regionally significant infrastructure and industry. However, it considers policy 10 needs to be amended to ensure that it is not without qualification. If the submitter is seeking the qualifications be strengthen then FFNZ will support it depending on the particulars. If the submitter wants less qualifications then FFNZ will oppose the submission point.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10087	Policy 10	AMEND Policy 10 to ensure that the recognition in the Regional Policy Statement for agriculture as a regionally significant industry is given equal weight when ensuring that point source discharges are to give effect to the targets of the Vision and Strategy as outlined in Table 3.11-1	Support	FFNZ supports implimenting the RPS and recognising agriculture as a regionally significant industry and treating it equal and proportionate with other regionally significant industry.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND MAKE any consequential amendments to the proposed changes to existing, objectives, policies and rules relating to point source discharge that are contained within Part D of PPC1 to give effect to the above relief.		
J Swap Ltd Submitter ID: 71618	PC1-6414	Policy 10	AMEND Policy 10 as follows - " Policy 10: Provide for point source discharges from activities of regional significance When deciding resource consent applications for point source discharges of nitrogen, phosphorus, sediment and microbial pathogens to water or onto or into land, <u>subject to Policy 11 and Policy 12</u> provide for the: a) Continued operation <u>and development</u> of regionally significant infrastructure; and b) Continued operation <u>and development</u> of regionally significant industry."	Support in part	FFNZ agrees with amendments that clarifies the provision and that clarifies that existing regionally significant industry and infrastructure is still subject to policy 11 and 12.
King Country Energy Limited Submitter ID: 60693	PC1-7879	Policy 10	RETAIN Policy 10. AND MAKE any similar amendments with like effect. AND MAKE any consequential amendments.	Support in part	FFNZ supports and recognition the importance of regionally significant infrastructure and industry. However, it considers policy 10 needs to be amended to ensure that it is not without qualification.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-9955	Policy 10	RETAIN Policy 10.	Support in part	FFNZ supports and recognition the importance of regionally significant infrastructure and industry. However, it considers policy 10 needs to be amended to ensure that it is not without qualification
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9211	Policy 10	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, provide <u>have regard to the continued operation of:</u> a. Continued operation of regionally significant infrastructure'; and	Oppose in part	FFNZ considers that regional significant infrastructure requires a strong directive like "recognise" rather than "have regard to".

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			b. Continued operation of regionally significant industry'. "		
Matamata-Piako District Council Submitter ID: 73419	PC1-3505	Policy 10	RETAIN Policy 10 and amend to provide the following definitions: " <u>Regionally significant infrastructure means 'municipal wastewater treatment plants, water supply treatment plants and bulk water supply, wastewater conveyance and storage systems, municipal supply dams and ancillary infrastructure.'</u> " AND " <u>Regionally significant industry means 'an economic activity based on use of natural and physical resources in the region which have benefits that are significant at a regional or national scale.'</u> " <u>These may include social, economic or cultural benefits or a combination thereof.</u> <u>Regional significant industry includes:</u> <u>a) Dairy manufacturing sites;</u> <u>b) Meat processing plants; and</u> <u>c) Pulp and paper processing plants."</u>	Support in part	FFNZ agrees that a clear and appropriate definition would provide more certainty for plan users.
Mercury NZ Limited Submitter ID: 73182	PC1-9572	Policy 10	RETAIN Policy 10 AND ADD to the Glossary of terms a definition for 'regionally significant industry'.	Support in part	FFNZ supports and recognition the importance of regionally significant infrastructure and industry. However, it considers policy 10 needs to be amended to ensure that it is not without qualification. FFNZ also agrees that a clear and appropriate definition would provide more certainty for plan users.
New Zealand Steel Ltd	PC1-3709	Policy 10	RETAIN Policy 10.	Support in part	FFNZ supports and recognition the importance of regionally significant infrastructure and industry. However, it considers policy 10 needs to be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73790					amended to ensure that it is not without qualification.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11838	Policy 10	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, provide <u>have regard to the continued operation of:</u> a. Continued operation of regionally significant infrastructure'; and b. Continued operation of regionally significant industry'."	Oppose in part	FFNZ considers that regional significant infrastructure requires a strong directive like "recognise" rather than 'have regard to'.
NZ Transport Agency Submitter ID: 73542	PC1-4831	Policy 10	AMEND Policy 10 as follows: "When deciding resource consent application for point source discharges of nitrogen, phosphorus, sediment and microbial pathogens to water or onto or into land, provide for the: <u>aa) Safe and efficient functioning of the existing and planned state highway network;</u> ..."	Support in part	FFNZ acknowledges the need to provide for the continued operation of regionally significant infrastructure and industry. It considers that new and growth in regionally significant infrastructure and industry should not be without qualification or without regard to effects on water quality.
Oil Companies Submitter ID: 73716	PC1-2593	Policy 10	AMEND Policy 10 to ensure that the policy framework (particularly policies 10-13) is applied to targeted only to the rural environment/farming activities. Several options are presented: Option A: RETAIN Policies 3.11.3.10 to 3.11.3.13 without modification AND AMEND the Introduction to Chapter 3.11 Area covered by Chapter 3.11/Nga Riu o nga Awa o Waikato me Waipā to read: "This Chapter 3.11 applies to the... This Chapter is additional to all other parts of the Plan. Where there are any inconsistencies, Chapter 3.11 prevails. <u>This Chapter only applies to discharges from pastoral land.</u> "	Oppose	One of FFNZ's fundamental principles is consistency in approach between point source and diffuse discharges; urban and rural. Accordingly FFNZ opposes amendments to provisions to only focus on discharges from pastoral land. It would be contrary to the principles of the Vision & Strategy.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>Option B: RETAIN Policies 3.11.3.10 to 3.11.3.13 without modification and include an introduction/advice note at the beginning of the Policies section (3.11.3) to read: "3.11.3 Policies/Nga Kaupapa Here. <u>The following policies apply to applications involving discharges from pastoral farm land only.</u>"</p> <p>Option C: AMEND Policies 3.11.3.10 to 3.11.3.13 to ensure that they only apply to discharges from pastoral farm land to read:</p> <p>"Policy 10 Provide for point source discharges of regional significance... When deciding resource consent... microbial pathogens to water or onto or into land <u>from pastoral farm land</u>, provide for the...</p> <p>Policy 11 Applications to Best Practicable Option and Mitigation....Require any person undertaking point source discharge....Waikato and Waipā River catchments <u>from pastoral farm land</u> to adopt the Best Practicable...</p> <p>Policy 12 Additional considerations for point source discharges <u>from pastoral farm land</u> in relation to water quality targets...</p> <p>Policy 13 Point source consent duration..."</p>		
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6426	Policy 10	AMEND Policy 10 to read: "...When deciding resource consent applications for point source discharges of nitrogen, phosphorus, sediment and/ or microbial pathogens to water or onto or into land, provide for the:	Oppose in part	FFNZ acknowledges the need to provide for the continued operation of regionally significant infrastructure and industry. It considers that new and growth in regionally significant infrastructure and industry should not be without qualification or without regard to effects on water quality.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>a. <u>Provide for the Continued</u> operation of regionally significant infrastructure; and b. <u>Provide for the Continued- operation or expansion</u> of regionally significant industry"</p> <p>AND AMEND the Glossary of terms by defining regionally significant industry to clearly include the Kinleith Industrial Park, for example, to read: "Regionally significant industry- means industry based on the region's use of natural and physical resources which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes: a) Wood processing plants; b) Dairy manufacturing sites; c) Meat processing plants; d) Mineral extraction activities; and e) Renewable energy generation."</p>		<p>FFNZ also agrees that a clear and appropriate definition would provide more certainty for plan users. FFNZ is not in a position to say whether Kinleith industry park is or is not a regionally significant industry however it notes that agriculture which is recognised as a regional significant industry is not in the definition and FFNZ seeks it to be included.</p>
Pamu Farms of New Zealand Submitter ID: 74000	PC1-5757	Policy 10	<p>ADD to Policy 10 a 5 year staged plan to detect and eliminate dry weather cross-connections of sewerage into storm water within territorial Authorities and private storm water discharges into streams and rivers. AND DELETE Policy 10 OR provide a similar level of recognition and protection for non-point sources.</p>	Support in part	<p>FFNZ supports a targeted approach that targets the contaminant that is of greatest issue (as opposed to a blanket approach of reducing all contaminants everywhere).</p> <p>FFNZ agrees diffuse and point source discharges should be treated equally and proportionally.</p>
Primary Land Users Group Submitter ID: 71427	PC1-11157	Policy 10	<p>AMEND Policy 10 to reflect the regional significance of primary production sectors.</p>	Support	<p>FFNZ agrees that primary production should be recognise as a significant regional industry.</p>

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Raukawa Charitable Trust Submitter ID: 74073	PC1-10581	Policy 10	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, provide <u>have regard to the continued operation of:</u> a. Continued operation of regionally significant infrastructure'; and b. Continued operation of regionally significant industry'."	Oppose in part	FFNZ considers that regional significant infrastructure requires a strong directive like "recognise" rather than "have regard to".
Rotorua Lakes Council Submitter ID: 73373	PC1-2507	Policy 10	AMEND Policy 10 by inserting the following sub clause: " <u>c) Continued operation of regionally significant infrastructure associated with the provision of municipal water supply, wastewater and storm water services, including where needed in response to urban development growth that gives effect to the Waikato Regional Policy Statement and Territorial Authority Spatial Plans.</u> " AND MAKE any consequential amendments.	Oppose in part	FFNZ considers that uncertainty about what is significant regional infrastructure and industry should be clarified by appropriate definitions.
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5693	Policy 10	AMEND Policy 10 so that all infrastructure, whether significant under this definition or not should be in play for making mitigations which are effective provided the mitigations do not force the infrastructure to be unfit for purpose either economic or physical.	Support in part	FFNZ supports and recognition the importance of regionally significant infrastructure and industry, but, it considers policy 10 need to be amended to ensure that it is not without qualification.
South Waikato District Council Submitter ID: 72892	PC1-4056	Policy 10	RETAIN Policy 10. AND ADD a definition for regionally significant infrastructure: " <u>Regionally significant infrastructure means 'municipal wastewater treatment plants, water supply treatment plants and bulk water supply, wastewater conveyance</u>	Support in part	FFNZ also agrees that a clear and appropriate definition would provide more certainty for plan users.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>and storage systems, municipal supply dams and ancillary infrastructure."</u> AND ADD a definition of regionally significant industry: "<u>Regionally significant industry means 'an economic activity based on use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits or a combination thereof</u> <u>Regional significant industry includes:</u> a) <u>Dairy manufacturing sites;</u> b) <u>Meat processing plants; and</u> c) <u>Pulp and paper processing plants."</u></p>		
Stevenson Resources Limited Submitter ID: 73732	PC1-5026	Policy 10	AMEND Policy 10 to read: "Policy 10: Provide for point source discharges <u>from activities</u> of regional significance. When deciding resource consent applications... to water and onto or into land, <u>subject to Policy 11 and Policy 12</u> provide for the: a) <u>Continued operation and development of regionally significant infrastructure;</u> and b) <u>Continued operation and development of regionally significant industry."</u> AND ADD a definition of regionally significant industry [submission point glossary of terms].	Support in part	FFNZ agrees with amendments that clarifies the provision and that clarifies that existing regionally significant industry and infrastructure is still subject to policy 11 and 12.
Taupo District Council Submitter ID: 74207	PC1-8112	Policy 10	RETAIN the intent of Policy 10 AND AMEND to recognise the monitoring undertaken during the operation of consented wastewater activities when assessing and considering resource consent renewal	Support in part	FFNZ considers that uncertainty about what is significant regional infrastructure and industry should be clarified by appropriate definitions.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND to ensure the definition of regionally significant infrastructure includes storm water infrastructure.		
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11787	Policy 10	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, provide <u>have regard to the continued operation of:</u> a. Continued operation of regionally significant infrastructure'; and b. Continued operation of regionally significant industry'."	Oppose in part	FFNZ considers that regional significant infrastructure requires a strong directive like "recognise" rather than have regard to.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8263	Policy 10	DELETE Policy 10 OR AMEND to define regionally significant infrastructure AND REMOVE industry from Policy 10 and ensure that regionally significant infrastructure and industry are considered in establishing any nutrient allocation approach, and that they meet best practice; and undertake measures to ensure water quality targets are achieved. AND CLARIFY how new activities are to be addressed.	Oppose in part	FFNZ supports and recognition the importance of regionally significant infrastructure and industry (policy 10). FFNZ agrees that an appropriate definition would provide more clarity and certainty. FFNZ opposes any nutrient allocation approach but consider that regionally significant industry and infrastructure, although important, still has to contribute (see amendments in FFNZ's submission on variation 1) FFNZ seeks amendments to Policy 10 that new activities adopt BPO.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10331	Policy 10	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, provide <u>have regard to the continued operation of:</u> a. Continued operation of regionally significant infrastructure'; and b. Continued operation of regionally significant industry'."	Oppose in part	FFNZ considers that regional significant infrastructure requires a strong directive like "recognise" rather than have regard to.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3342	Policy 10	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, provide <u>have regard to the continued operation of:</u> a. Continued operation of regionally significant infrastructure'; and b. Continued operation of regionally significant industry'."	Oppose in part	FFNZ considers that regional significant infrastructure requires a strong directive like "recognise" rather than have regard to.
Waikato District Council (WDC) Submitter ID: 73418	PC1-3129	Policy 10	RETAIN Policy 10.	Support in part	FFNZ supports and recognition the importance of regionally significant infrastructure and industry. However, it considers policy 10 needs to be amended to ensure that it is not without qualification
Waikato Regional Council Submitter ID: 72890	PC1-3061	Policy 10	AMEND Policy 10 to read: "a. Continued operation of regionally significant infrastructure, <u>including the need for flood and drainage infrastructure to convey water during flood events;</u> and"	Support in part	FFNZ considers that uncertainty about what is significant regional infrastructure and industry should be clarified by appropriate definitions.
Waipa District Council Submitter ID: 67704	PC1-3161	Policy 10	RETAIN Policy 10.	Support in part	FFNZ supports and recognition the importance of regionally significant infrastructure and industry. However, it considers policy 10 needs to be amended to ensure that it is not without qualification
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11350	Policy 10	AMEND Policy 10 to read: "Policy 10: Provide for <u>diffuse or point source</u> discharges of regional significance... When deciding resource consent applications for <u>diffuse or point source</u> discharges... b. Continued operation <u>and development</u> of regionally significant industry <u>and primary production.</u> "	Support	FFNZ agrees diffuse and point source discharges should be treated equally and proportionally. FFNZ agrees that agriculture is a regional significant industry and should be treated similarly to other regional significant industries.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2117	Policy 10	RETAIN Policy 10.	Support in part	FFNZ supports and recognition the importance of regionally significant infrastructure and industry. However, it considers policy 10 needs to be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					amended to ensure that it is not without qualification
Waitomo District Council Submitter ID: 73688	PC1-10318	Policy 10	RETAIN Policy 10. AND AMEND the Policies to address the policy disconnect between Policies 10 to 12 and Policy 6 [Policies 10 to 12 assume that certain discharges can have an adverse effect to a point and may increase, but Policy 6 does not make the same allowance].	Support	FFNZ agrees that there is no consistency in the approach between; point source and diffuse discharge and supports relief that will treat diffuse and point source discharges equally and proportionally with similar allowances.
Watercare Services Ltd Submitter ID: 74077	PC1-8339	Policy 10	RETAIN Policy 10. AND AMEND Policy 10 to include the future development of regionally significant infrastructure to service future growth. AND ADD to the glossary of terms the definition of the regionally significant infrastructure as defined in the Waikato Regional Policy Statement.	Oppose in part	FFNZ considers that future development of regionally significant infrastructure should contribute to the management of the discharge of contaminants. FFNZ also agrees that a definition would provide more certainty.
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-9585	Policy 11	AMEND Policy 10, 11 and 12 to strengthen in terms of urban centres.	Support	One of FFNZ's fundamental principles is consistency in approach between point source and diffuse discharges; urban and rural. FFNZ considers that this is achieved through point source discharges adopting BPO and diffuse discharges adopting MPA.
AFFCO New Zealand Limited Submitter ID: 74140	PC1-7636	Policy 11	AMEND Paragraph 1 of Policy 11 as follows: "...Where it is not practicable to avoid or mitigate all <u>any</u> adverse effects, an offset measure may be proposed in an alternative location or locations to the point source discharge, for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and that offsetting measures applies to both and also that offsetting measures are able to be in an alternative location.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			will or may result from allowing the activity provided that the:" OR AMEND the second sentence of Policy 11 to read as follows: " <u>BPO in the context of point source discharges will be interpreted to include the ability to propose an offset measure in an alternative location or locations, where it is not practicable to avoid or mitigate all adverse effects, an offset measure may be proposed in an alternative location or locations to the point source discharge, for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that will or may result from allowing the activity provided that the...</u> "		
A S Wilcox & Sons Ltd Submitter ID: 73142	PC1-4317	Policy 11	AMEND Policy 11 to extend offsetting to diffuse discharges where the same environmental outcomes can be achieved.	Support	Diffuse and point source discharges should be treated equally and proportionally including in offset measures.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10887	Policy 11	AMEND Policy 11 to read: " ...Where it is not practicable to avoid or mitigate all adverse effects <u>all adverse effects cannot be reasonable avoided, they should be mitigated, and where they cannot reasonably be mitigated, an offset measure may should be proposed in an alternative location or locations to the point of discharge... provided that the:</u> a. Primary discharge does not result in any significant <u>or</u> toxic adverse effects at the point of discharge location; and ... d. Offset measure remains in place for the duration of the consent and is	Oppose	FFNZ oppose the submitter's hierarchy and considers that offset should be able to be considered all the time. FFNZ considers that offset is a mitigation measure (and should apply as such for both diffuse and point source discharges). Further FFNZ considers the qualifiers are appropriately to addresses concerns. FFNZ do not agree with the submitter's proposed amendments for qualifier d) as amongst others it fetters the council's discretion on appropriate resource consent conditions for offset measures.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			secured by consent condition <u>and, if necessary, a bond in order to ensure it is achieved and maintained in the long term preferably in perpetuity; and</u> e. <u>Offset measure results in a predicted net decrease of the contaminant in the receiving environment."</u>		FFNZ opposes submitters proposed e) because considers that offsets for different contaminants and different sub-catchments ought to be provided for.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6893	Policy 11	ADOPT Policy 11 as notified. AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA).
BT Mining Ltd Submitter ID: 72453	PC1-9924	Policy 11	AMEND Policy 11 to read as follows: "...in the Waikato and Waipā River catchments to adopt the Best Practicable Option* to avoid or mitigate the adverse effects of the discharge, at the time a resource consent application is decided. Where it is not practicable to avoid or mitigate all adverse effects, an offset measure may be proposed in an alternative location or locations to the point source discharge, for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that will or may result from allowing the activity provided that the: a. Primary discharge does not result in any significant toxic adverse effect at the point source discharge location; and b. Offset measure is for the same contaminant; and c. Offset measure occurs preferably within the same sub-catchment in which the primary discharge occurs and if this is	Support in part Oppose in part	One of FFNZ's fundamental principles is consistency in approach between point source and diffuse discharges. FFNZ considers that this is achieved through point source discharges adopting BPO and diffuse discharges adopting MPA and both be allowed to have offset measures be taken into account. FFNZ opposes submitters qualifiers to offsetting because considers that offsets for different contaminants (and different sub-catchments) ought to be provided for.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>not practicable, then within the same Freshwater Management Unit or a Freshwater Management Unit located upstream, and</p> <p>d. Offset measure remains in place for the duration of the consent and is secured by consent condition.</p> <p><u>as at the time the resource consent application is decided to avoid, remedy or mitigate the adverse effects of the discharge. An applicant may propose an offset measure in an alternative location or locations to the proposed point source discharge and the positive effects of that offset measure must be taken into account when assessing the overall effects of the proposed discharge and the conditions of any consent. Any such offset measure must:</u></p> <ul style="list-style-type: none"> <u>- Be for the same contaminant or contaminants;</u> <u>- Occur preferably within the same sub-catchment in which the primary discharge is proposed to occur but if this is not practicable within the same Freshwater Management Unit or a Freshwater Management Unit located upstream; and</u> <u>- Remain in place for the duration of the consent and able to be secured by the conditions of the resource consent"</u> 		
Cameron, Bruce Submitter ID: 60603	PC1-6361	Policy 11	<p>AMEND Policy 11 to include all stakeholders, eg through Farm Environment Plans.</p> <p>AND CLARIFY what is a 'significant toxic adverse effect'</p>	Support in part, oppose in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND the rules to reflect Policy 11.		The submitter has not proposed any relief for clarification of "significant toxic adverse effect or the rule changes to reflect the policy and accordingly FFNZ does not support these submission points.
Contact Energy Limited Submitter ID: 73714	PC1-7380	Policy 11	AMEND wording of Policy 11 from " all adverse effects " to " <u>any significant adverse effect</u> " AND ENSURE that all adverse effects of a point source discharge are not required to be avoided, mitigated or offset AND AMEND to allow existing and low discharging activities to continue or to be established for both point source and diffuse source discharges.	Support in part	FFNZ agrees it should not be all adverse effects that are required to be avoided, mitigated or offset. However FFNZ seeks consistency so that it should equally apply to diffuse discharges. FFNZ support s the adoption of a less stringent provisions for farming activities on smaller properties or of a low intensity.
Department of Conservation Submitter ID: 71759	PC1-10694	Policy 11	AMEND Policy 11 to ensure that avoidance and then mitigation of adverse effects from point source discharges are achieved as far as reasonably practicable before offsetting is considered. AND AMEND Policy 11 to ensure that the significant values of water bodies are recognised and provided for when determining the suitability of offsetting to acknowledge instances where adverse effects on values cannot be offset.	Oppose	FFNZ oppose the submitter's hierarchy and considers that offset should be able to be considered all the time. FFNZ considers that offset is a mitigation measure (and should apply as such for both diffuse and point source discharges). Further FFNZ considers the qualifiers are appropriately to addresses concerns.
Farm Environment Trust (Waikato) Submitter ID: 73798	PC1-5057	Policy 11	RETAIN in Policy 11 the principle of offsets.	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9797	Policy 11	RETAIN Policy 11.	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10601	Policy 11	<p>AMEND Policy 11 to read: "Policy 11: Application of Best Practicable Option and mitigation or offset of effects to Point Source Discharge. Require any person undertaking a point source discharge of nitrogen, phosphorus, sediment or microbial pathogens to water or onto or into land in the Waikato and Waipā River catchments to adopt the Best Practicable Option* to avoid or mitigate the adverse effects of the discharge, at the time a resource consent application is decided" AND ADD a NEW Policy 11A to read: <u>"Policy 11A: Offsetting the effects of Point Source Discharge</u> Where it is not practicable to avoid or mitigate all <u>any</u> adverse effects, an offset measure may be proposed in an alternative location or locations to the point source discharge, for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that will or may result from allowing the activity provided that the:</p> <p>a. The Pprimary discharge does not result in any significant toxic adverse effect at the point source discharge location; and b. The Offset measure is for the same</p>	Support in part	<p>FFNZ agrees that the separation of Policy 11 into two policies is helpful.</p> <p>FFNZ seeks amendments to proposed Policy 11 and 11A to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA).</p> <p>FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1). However, it considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>contaminant; and</p> <p>c. The Offset measure occurs preferably within the same sub-catchment in which the primary discharge occurs and if this is not practicable, then within the same Freshwater Management Unit^ or a Freshwater Management Unit^ located upstream; and</p> <p>d. <u>The offset measure is monitored and results in a net reduction in adverse environmental effects caused by the contaminant(s) being offset in the Point Source Discharge on the Waikato or Waipā River catchment; and</u></p> <p>e. The Offset measure remains in place for the duration of the consent and is secured by consent condition <u>or another legally binding mechanism.</u>"</p>		
<p>Fulton Hogan Limited Submitter ID: 74048</p>	<p>PC1-10747</p>	<p>Policy 11</p>	<p>SPLIT Policy 11 into two policies to read as follows: "Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges Require any person undertaking a point source discharge . . . at the time a resource consent application is decided. "Policy 11A: <u>Offsetting the effects of point source discharges</u> Where it is not practicable to avoid or mitigate all <u>any significant</u> adverse effects, an offset measure may be proposed in an alternative location or locations to the point source discharge for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the</p>	<p>Support in part</p>	<p>FFNZ agrees that the separation of Policy 11 into two policies is helpful.</p> <p>FFNZ seeks amendments to proposed Policy 11 and 11A to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA).</p> <p>FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1). However, it considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>discharge(s) that will or may result from allowing the activity provided that the:</p> <p>a) <u>The P</u>primary discharge does not result in any significant toxic adverse effect at the point source discharge location; and</p> <p>b) <u>The O</u>ffset measure is for the same contaminant; and</p> <p>c) <u>The O</u>ffset measure occurs preferably within the same or upstream of the sub-catchment in which the primary discharge occurs and if this is not practicable, then within the same Freshwater Management Unit or a Freshwater Management Unit located upstream; and [NOTE THAT THE SUBMITTER REQUESTS DIFFERENT WORDING IN THE INITIAL TABLE, TO THAT IN THE MARKED UP VERSION]</p> <p>d) <u>The offset measure is monitored and results in a net reduction in adverse environmental effects on the Waikato and Waipā River catchment caused by nitrogen, phosphorous, sediment and/or microbial pathogens; and</u></p> <p>e) <u>The O</u>ffset measure remains in place for the duration of the consent and is secured by consent condition or another <u>legally binding mechanism.</u>"</p>		
GBC Winstone Submitter ID: 73992	PC1-2947	Policy 11	AMEND Policy 11 to read: "Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges. Require any person undertaking a point source discharge... a resource consent application to be decided.	Support in part	<p>FFNZ agrees that the separation of Policy 11 into two policies is helpful.</p> <p>FFNZ seeks amendments to proposed Policy 11 and 11A to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>Policy 11A: Offsetting the effects of point source discharges.</u> Where it is not practicable to avoid or mitigate all<u>any significant</u> adverse effects, an offset measure may be proposed...locations to the point source discharge, for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that will or may result from allowing the activity provided that the:</p> <p>a) The Pprimary discharge does not result...</p> <p>b) The Offset measure is for the same...</p> <p>c) The Offset measure occurs preferably within the same sub-catchment...</p> <p>d) <u>The offset measure is monitored and results in a net reduction in adverse environmental effects on the Waikato or Waipā River catchment caused by nitrogen, phosphorus, sediment and/or microbial pathogens; and</u></p> <p>e) The Offset measure remains in place for the duration of the consent and is secured by consent condition <u>or another legally binding mechanism.</u>"</p>		<p>FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1). However, it considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).</p>
<p>Genesis Energy Limited Submitter ID: 74052</p>	<p>PC1-8801</p>	<p>Policy 11</p>	<p>AMEND Policy 11 to read: "...Where it is not practicable to avoid or mitigate<u>prevent or minimise all</u> adverse effects, an offset measure may be proposed <u>by that person</u> in an alternative location or locations to the point source discharge, for the purpose of ensuring positive effects on the environment to lessen any <u>the</u> residual adverse effects of the discharge(s) that will or may result</p>	<p>Support in part</p>	<p>FFNZ supports offsetting (for both point source and diffuse discharges) and the provision for offsetting (as amended by FFNZ's submission on Variation 1). However, it considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>from allowing the activity provided that the:</p> <p>a. Primary discharge does not result in any significant toxic adverse effect at the point source discharge location; and</p> <p>b. Offset measure is for the same contaminant; and</p> <p>c. b. Offset measure occurs preferably within the same sub-catchment in which the primary point source discharge occurs and if this is not practicable, then within the same Freshwater Management Unit or a Freshwater Management Unit located upstream, and</p> <p>d. c. Offset measure remains in place for the duration of the consent and is secured by consent condition,"</p>		
Graymont (NZ) Limited Submitter ID: 73954	PC1-2842	Policy 11	RETAIN Policy 11.	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both.
Hamilton City Council Submitter ID: 74051	PC1-10758	Policy 11	<p>AMEND Policy 11 to read:</p> <p>"Require any person undertaking a point source discharge of nitrogen, phosphorus, sediment or microbial pathogens to water or onto land in the Waikato and Waipā River catchments to adopt the Best Practicable Option to avoid or mitigate the adverse effects of the discharge (the primary discharge), at the time a resource consent application is decided. Where it is not practicable to avoid or mitigate all adverse effects, an <u>one or more</u> offset measures may be proposed. <u>Offset measures may apply in</u></p>	Support	<p>FFNZ agrees that policy 11 should apply to discharges (both diffuse and point source)</p> <p>FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1). It agrees with offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>an alternative location or locations to the point source <u>primary</u> discharge, for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that will or may result from allowing the activity provided that the:</p> <ul style="list-style-type: none"> a. Primary discharge does not result in any significant toxic adverse effect at the point source discharge location; and b. Offset measure is for the same contaminant; and c. Offset measures occurs preferably within the same sub-catchment in which the primary discharge occurs and is this is not practicable, then within the same Freshwater Management Unit or Freshwater Management Unit located upstream, and d. Offset measures remains in place for the duration of the consent and <u>is-are</u> secured by consent condition. <p><u>The purpose of any offset measures shall be to ensure a net improvement in water quality in the specified sub-catchment or Freshwater Management Unit that exceeds the residual adverse effects of allowing the primary discharge.</u></p> <p><u>When a resource consent application is decided, decide also the Best Practicable Option, details of any offset measures, and the required timing for implementation of the Best Practicable Option and any offset measures. Allow implementation of the Best Practicable</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<u>Option and any offset measures to be staged."</u>		
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5705	Policy 11	AMEND to strengthen Policy 11.	Oppose	The submitter did not provide particulars of the specific amendments to policy 11 sought and accordingly FFNZ opposes the submission point.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10088	Policy 11	RETAIN Policy 11.	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both.
J Swap Ltd Submitter ID: 71618	PC1-6417	Policy 11	AMEND Policy 11 as follows - "Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges Require any person undertaking a point source discharge of nitrogen, phosphorus, sediment or microbial pathogens to water or onto or into land in the Waikato and Waipā River catchments to adopt the Best Practicable Option* to avoid or mitigate the adverse effects of the discharge, at the time a resource consent application is decided. <u>Policy 11A: Offsetting the effects of point source discharges</u> Where it is not practicable to avoid or mitigate all any significant adverse effects, an offset measure may be proposed in an alternative location or locations to the point source discharge, for the purpose of ensuring positive effects on the environment to lessen any residual	Support in part	FFNZ agrees that the separation of Policy 11 into two policies is helpful. FFNZ seeks amendments to proposed Policy 11 and 11A to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA). FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1). However, it considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>adverse effects of the discharge(s) that will or may result from allowing the activity provided that the:</p> <p>a) The Pprimary discharge does not result in any significant toxic adverse effect at the point source-discharge location; and</p> <p>b) The Offset measure is for the same contaminant; and</p> <p>c) The Offset measure occurs preferably within the same or upstream of the sub-catchment in which the primary discharge occurs and if this is not practicable, then within the same Freshwater Management Unit or a Freshwater Management Unit located upstream, and</p> <p>d) <u>The offset measure is monitored and results in a net reduction in adverse environmental effects on the Waikato or Waipā River catchment caused by nitrogen, phosphorus, sediment and/or microbial pathogens; and</u></p> <p><u>The O</u>ffset measure remains in place for the duration of the consent and is secured by consent condition <u>or another legally binding mechanism.</u>"</p>		
King Country Energy Limited Submitter ID: 60693	PC1-7880	Policy 11	<p>RETAIN Policy 11. AND MAKE any similar amendments with like effect. AND MAKE any consequential amendments.</p>	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both.
Lakes and Waterways Action Group Trust (LWAG)	PC1-4079	Policy 11	<p>AMEND Policy 11 to define short and long term targets for Waste Water Treatment Plants. AND CONSIDER increasing Waikato Regional Council resources to support</p>	Support in part	FFNZ agrees that waste water treatment plants should also contribute to the management of discharges and water quality.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 53342			the consent renewal process such that the defined short and long term targets in PPC1 are complied with.		
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-9972	Policy 11	AMEND Policy 11 to avoid any interpretation that the obligation to avoid, remedy or mitigate the adverse effects of a point source discharge is greater than or extends beyond application of the Best Practicable Option as determined at the time an approval is obtained. AND AMEND Policy 11 to read: "Where it is not practicable to avoid or mitigate all adverse effects, an offset measure may be proposed BPO in the context of point source discharges will be interpreted to include the ability to propose an offset measure in an alternative location or locations to the point source discharge for the purpose of..."	Oppose in part	The first part of the submission point is unclear and accordingly FFNZ cannot support it. In general FFNZ understand that every person has a duty to avoid, remedy or mitigate any adverse effects on the environment arising from an activity carried on by the person and that such a duty will remain regardless of the BPO. FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both. FFNZ supports offsetting and the provision for offsetting as a mitigation measure (for both point source and diffuse discharges).
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9212	Policy 11	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects to from point source discharges... Require any person undertaking a point source discharge... effects of the discharge at the time a resource consent application is decided . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to lessen any by offsetting residual adverse effects of the discharge..."	Support in part	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.
Matamata-Piako District Council Submitter ID: 73419	PC1-3507	Policy 11	AMEND Policy 11 to clarify that the principle of the point source discharger can implement offset measures:	Support	FFNZ agrees and its submission on Variation 1 seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<ul style="list-style-type: none"> • as part of measures to avoid, remedy or mitigate adverse effects; • to be in alternative locations and or sub-catchments; • that are available for more than one type of contaminant; and • which can be staged over the period of the resource consent 		MPA) and offsets for different contaminants and different sub-catchments ought to be provided for. FFNZ also agrees with the staged approach to offsetting as it is a mitigation measure.
Mercury NZ Limited Submitter ID: 73182	PC1-9574	Policy 11	RETAIN Policy 11.	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4622	Policy 11	AMEND Policy 11 to read: "Require any person undertaking point... avoid or mitigate the adverse effects <u>(that are more than minor)</u> of the discharge, at the time..."	Support	FFNZ considers it is a sensible clarification.
New Zealand Steel Ltd Submitter ID: 73790	PC1-3713	Policy 11	AMEND Policy 11 to avoid any interpretation that the obligation to avoid, remedy and mitigate the adverse effects of a point source discharge is greater than or extends beyond application of the Best Practicable Option as determined at the time an approval is obtained. For example, amend the second sentence of Policy 11: " Where it is not practicable to avoid or mitigate all adverse effects, an offset measure may be proposed <u>Best Practicable Option in the context of point source discharges will be interpreted to include the ability to propose an offset measure</u> in an alternative location or locations to the point source discharge for the purpose of..."	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both. FFNZ supports offsetting at alternative locations. FFNZ considers that an offset can be both additional to or form part of the Best Practicable Options.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11839	Policy 11	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects to <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge at the time a resource consent application is decided . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to lessen <u>any</u> by offsetting residual adverse effects of the discharge..."	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.
NZ Transport Agency Submitter ID: 73542	PC1-4833	Policy 11	RETAIN Policy 11.	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both.
Oil Companies Submitter ID: 73716	PC1-2594	Policy 11	AMEND Policy 11 to ensure that the policy framework (particularly policies 10-13) is applied to targeted only to the rural environment/farming activities. Several options are presented: Option A: RETAIN Policies 3.11.3.10 to 3.11.3.13 without modification AND AMEND the Introduction to Chapter 3.11 Area covered by Chapter 3.11/Nga Riu o nga Awa o Waikato me Waipā to read: "This Chapter 3.11 applies to the... This Chapter is additional to all other parts of the Plan. Where there are any inconsistencies, Chapter 3.11 prevails. <u>This Chapter only applies to discharges from pastoral land.</u> Option B: RETAIN Policies 3.11.3.10 to 3.11.3.13 without modification and include an introduction/advice note at the	Oppose	One of FFNZ's fundamental principles is consistency in approach between point source and diffuse discharges; urban and rural. Accordingly FFNZ opposes narrowing provisions to only focus on discharges from pastoral land. It would be contrary to the principles of the Vision & Strategy.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>beginning of the Policies section (3.11.3) to read: "3.11.3 Policies/Nga Kaupapa Here. <u>The following policies apply to applications involving discharges from pastoral farm land only.</u>"</p> <p>Option C: AMEND Policies 3.11.3.10 to 3.11.3.13 to ensure that they only apply to discharges from pastoral farm land to read:</p> <p>"Policy 10 Provide for point source discharges of regional significance... When deciding resource consent... microbial pathogens to water or onto or into land <u>from pastoral farm land</u>, provide for the...</p> <p>Policy 11 Applications to Best Practicable Option and Mitigation....Require any person undertaking point source discharge....Waikato and Waipā River catchments <u>from pastoral farm land</u> to adopt the Best Practicable...</p> <p>Policy 12 Additional considerations for point source discharges <u>from pastoral farm land</u> in relation to water quality targets...</p> <p>Policy 13 Point source consent duration..."</p>		
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6547	Policy 11	<p>AMEND Policy 11 to make it clear that the adoption of the Best Practicable Options is the principal mechanism for achieving Objective 3.</p> <p>AND AMEND Policy 11 to make it clear that an offset is not additional to, but may form part of the Best Practicable Options.</p> <p>AND AMEND Policy 11 to make clear that the discharge/activity will not require</p>	Oppose in part Support in part	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality , amongst others.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			a ten percent or any other standardised numeric reduction in discharges towards the long term water quality improvements as indicated by the short term water quality attribute targets in Table 3.11-1 as an obligation additional to the adoption of the Best Practicable Options.		<p>FFNZ considers that an offset can form part of the Best Practicable Options and MPAs (for diffuse discharges).</p> <p>FFNZ does not support a one size fits all approach that requires 10% reductions (or something similar). FFNZ considers that a tailored approach ought to be adopted.</p>
Pamu Farms of New Zealand Submitter ID: 74000	PC1-5848	Policy 11	AMEND Policy 11 to provide a new policy for a systematic review of point source and their seasonal effects on water quality. Include ranked and prioritised sites, to offer alternative land and funding. All catchment community to fund, including Agri-community/processing industries. OR ADD a NEW Policy and Rules for systemic S.128 review of all existing discharge permits over the term of PPC1.	Support in part, oppose in part	<p>FFNZ supports measures to close the currently gaps in understanding and knowledge to better manage contaminant loss but oppose the funding by agricomunity.</p> <p>FFNZ also has concerns with the method of prioritisation or ranking.</p> <p>FFNZ will in principle oppose a review of all existing resource consent unless it is a last resort because it is such a draconian step and leads to uncertain, amongst other reasons.</p>
Primary Land Users Group Submitter ID: 71427	PC1-11159	Policy 11	AMEND Policy 11 to allow for Best Practicable Option management to occur AND AMEND to enable offsetting within an enterprise where environmental investment has off-set diffuse discharges.	Support	One of FFNZ's fundamental principles is consistency in approach between point source and diffuse discharges; urban and rural. FFNZ considers that this is achieved through point source discharges adopting BPO and diffuse discharges adopting MPA and offsetting is available for both.
Pukekohe Vegetable Growers Association Inc (PVGA)	PC1-7799	Policy 11	RETAIN Policy 11.	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 74220					
Raukawa Charitable Trust Submitter ID: 74073	PC1-10555	Policy 11	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects to <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge at the time a resource consent application is decided . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to lessen <u>any</u> by offsetting residual adverse effects of the discharge..."	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.
Rotorua Lakes Council Submitter ID: 73373	PC1-2508	Policy 11	AMEND Policy 11 by removal of the following sub clause: "b. Offset measure is for the same contaminant." AND AMEND by addition of the following: <u>"The purpose of any offset measure shall be able to ensure a net improvement in water quality in the specified sub-catchment of Freshwater Management Unit that exceeds the residual adverse effects of allowing the primary discharge."</u> AND MAKE any consequential amendments.	Support in part	FFNZ's submission on Variation 1 also seeks deletion of b. However FFNZ seeks amendments offsetting in a different sub-catchments can to be provided for.
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5727	Policy 11	DELETE the use of offset programs. Policy 11 REPLACE with the use of pollution levies to achieve the required outcome.	Oppose	FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1). FFNZ opposes a pollution levy amongst others because it is a blunt instrument and this would likely impose significant cost for no net benefit.
Southern Pastures Limited Partnership	PC1-11108	Policy 11	No specific decision sought Policy 11.		FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 74062					adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both.
South Waikato District Council Submitter ID: 72892	PC1-4059	Policy 11	AMEND Policy 11 to clarify that the principle of the point source discharger being able to implement offset measures is: as part of measures to avoid, remedy or mitigate adverse effects, to be in alternative locations and or sub-catchments that are available for more than one type of contaminant and can be staged over the period of the resource consent.	Support	FFNZ agrees and its submission on Variation 1 seeks amendments to Policy 11 to ensure that the policy applies consistently to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsets for different contaminants and different sub-catchments ought to be provided for. FFNZ also agrees with enabling a staged approach to offsetting.
Stevenson Resources Limited Submitter ID: 73732	PC1-5027	Policy 11	AMEND Policy 11 to read: "Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges. Require any person undertaking a point source discharge of nitrogen, phosphorus, sediment or microbial pathogens to water or onto or into land in the Waikato and Waipā River catchments to adopt the Best Practicable Option to avoid or mitigate the adverse effects of the discharge, at the time a resource consent application is decided. Policy 11A: Offsetting the effects of point source discharges. Where it is not practicable to avoid or mitigate all any significant adverse effects, an offset measure may be proposed in an alternative location or locations to the point source discharge , for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that	Support in part	FFNZ agrees that the separation of Policy 11 into two policies is helpful. FFNZ seeks amendments to proposed Policy 11 and 11A to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA). FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1). However, it considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>will or may result from allowing the activity provided that the :</p> <p>a) The primaryPrimary discharge does not result in any significant toxic adverse effect at the point source discharge location; and</p> <p>b) The offsetOffset measure is for the same contaminant; and</p> <p>c) The offsetOffset measure occurs preferably within the same or upstream of the sub-catchment in which the primary discharge occurs and if this is not practicable, then within the same Freshwater Management Unit^Δ; or a Freshwater Management Unit^Δ located upstream; and</p> <p>d) <u>The offset measure is monitored and results in a net reduction in adverse environmental effects on the Waikato or Waipā River catchment caused by nitrogen, phosphorus, sediment and/or microbial pathogens; and</u></p> <p>e) The offsetOffset measure remains in place for the duration of the consent and is secured by consent condition <u>or another legally binding mechanism.</u>"</p>		
<p>Taupo District Council Submitter ID: 74207</p>	<p>PC1-8115</p>	<p>Policy 11</p>	<p>AMEND Policy 11 to ensure that offsetting is considered a mitigation measure rather than being considered only after all other options to avoid or mitigate have been considered AND AMEND to recognise the significant contribution made to date by the Taupo district communities AND AMEND to provide for offsetting in the Lake Taupō catchment as the</p>	<p>Oppose in part, support in part</p>	<p>FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both FFNZ supports that offsetting can be a mitigation measure if it is also considered as such for diffuse discharge.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			Freshwater Management Unit above the Waikato River.		
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11788	Policy 11	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects to from point source discharges... Require any person undertaking a point source discharge... effects of the discharge at the time a resource consent application is decided . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to lessen any by offsetting residual adverse effects of the discharge..."	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8264	Policy 11	REMOVE 'toxic' from Policy 11(a), AND REMOVE all reference to offsets from Policy 11, including the second sentence and clauses (b), (c) and (d).	Oppose	FFNZ supports offsetting and the provision for offsetting (as amended by FFNZ's submission on Variation 1). However, it considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule). FFNZ seeks that 'toxic' in Policy 11(a) be retained as qualifier.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10339	Policy 11	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects to from point source discharges... Require any person undertaking a point source discharge... effects of the discharge at the time a resource consent application is decided . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to lessen any by offsetting residual adverse effects of the discharge..."	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3349	Policy 11	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects to <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge at the time a resource consent application is decided . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to lessen <u>any</u> by offsetting residual adverse effects of the discharge..."	Support	FFNZ supports making provisions clear and certain for plan users by removing any ambiguity.
Waikato District Council (WDC) Submitter ID: 73418	PC1-3131	Policy 11	RETAIN Policy 11.	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both.
Waikato Regional Council Submitter ID: 72890	PC1-3062	Policy 11	AMEND Policy 11 so that flood management and drainage infrastructure are not required to mitigate contaminants that are sourced from land use activities within catchment.	Support in part	FFNZ considers that there should be consistency in approach between point source and diffuse discharges; urban and rural. To the extent that farmers are required to reasonably identify and assess mitigations for critical source areas, flood management and drainage infrastructure should adopt a similar approach. FFNZ considers recognition should be given (for all) that there will be unforeseeable things that happen outside the landowner's control.
Waikato River Authority Submitter ID: 74033	PC1-11561	Policy 11	AMEND Policy 11 to explicitly require offsets and to result in a net contaminant loss improvement.	Oppose	FFNZ considers that not all contaminants may need to reduce.
Waipa District Council Submitter ID: 67704	PC1-3162	Policy 11	RETAIN Policy 11.	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11351	Policy 11	AMEND Policy 11 to read: "Policy 11: Application of Best Practicable Option and mitigation or offset of effects to <u>diffuse or point source discharges...</u> Require any person undertaking a <u>diffuse or point source discharge...</u> an alternative location or locations to the <u>diffuse or point source discharge...</u> a. Primary discharge does not result in any significant toxic adverse effect at the point source discharge location on the environment; and"	Support	FFNZ supports amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA).
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2118	Policy 11	RETAIN Policy 11.	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both.
Waitomo District Council Submitter ID: 73688	PC1-10319	Policy 11	RETAIN Policy 11. AND AMEND the Policies to address the policy disconnect between Policies 10 to 12 and Policy 6 [Policies 10 to 12 assume that certain discharges can have an adverse effect to a point and may increase, but Policy 6 does not make the same allowance].	Support in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both. FFNZ agrees that diffuse and point source discharges should be treated equally and proportionally and will support amendments that provide for such consistency.
Watercare Services Ltd Submitter ID: 74077	PC1-8122	Policy 11	RETAIN Policy 11. AND AMEND to be consistent with the RMA by relating the requirements for Best Practical Option to consideration of options to determine the best practicable one to prevent or minimise adverse effects.	Support in part, oppose in part	FFNZ seeks amendments to Policy 11 to ensure that the policy applies to both point source (which adopt BPO) and diffuse discharges (which adopt MPA) and offsetting is available for both. It is unclear what relief amendments the submitter seeks for policy 11. FFNZ cannot

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND to be consistent with the RMA by relating the requirements for offsetting to residual effects that are significant adverse effects. AND AMEND to reflect best practice RMA policy drafting. AND AMEND to split into a Best Practical Option Policy and an offsetting policy.		support the amendments without being provided with the proposed amendments to the policy. FFNZ agrees that the separation of Policy 11 into two policies could be helpful.
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-9587	Policy 12	AMEND Policy 10, 11 and 12 to strengthen in terms of urban centres.	Support	One of FFNZ's fundamental principles is consistency in approach between point source and diffuse discharges; urban and rural. Accordingly FFNZ supports explicit provisions to ensure that urban contributes to management of discharges.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10888	Policy 12	REMOVE the word 'Additional' from the Policy 12 title AND REPLACE Policy 12 with the following: <u>"Impose conditions and discharge standards on point source discharges to ensure that the reduction targets and timeframes in Tables 3.11-1 and 3.11-2, and the sub-catchment nitrogen leaching reductions in Schedule E, can be met, based on a consideration of the contribution made by the discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads, and having regard to:</u> <u>a. The relative proportion of nitrogen, phosphorus, sediment and microbial pathogens that the particular point source discharge contributes to the catchment; and</u>	Oppose in part	FFNZ supports proposed policy 12 and seeks that it be retained with some amendments. Accordingly FFNZ opposes the submission point ,amongst others reasons, because FFNZ considers that reference should be made to short term targets in Objective 3 and the outcomes anticipated by the Vision & Strategy and values referred to in Objective 1 (FFNZ has concerns with the numeric long term targets) and FFNZ does not support a precautionary approach. FFNZ also considers past technology upgrades undertaken to reduce discharge is a relevant consideration.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p><u>b. Whether it is appropriate to stage future mitigation actions to allow investment costs to meet the water quality targets specified above to be spread over time.</u></p> <p><u>c. The need to favour caution and environmental protection where the information available is uncertain or inadequate."</u></p>		
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6896	Policy 12	ADOPT Policy 12 as notified. AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
Cameron, Bruce Submitter ID: 60603	PC1-6365	Policy 12	RETAIN considering past technology upgrades and the costs associated with upgrading in Policy 12 AND ADOPT a sub-catchment approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND PPC1 to allow these considerations to occur across all sources influencing the health and well-being of the Waikato and Waipā rivers AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.	Support in part	<p>One of FFNZ's fundamental principles is consistency in approach between point source and diffuse discharges; urban and rural. FFNZ agrees that pest species need to be managed to improve water quality. FFNZ also agree that national or regional significant hydro dams should look at reducing effects on water quality.</p> <p>FFNZ supports a sub-catchment approach and sub-catchment groups with group action plans to improve water quality in the sub-catchment.</p>
Contact Energy Limited Submitter ID: 73714	PC1-7378	Policy 12	RETAIN Policy 12.	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
Department of Conservation	PC1-10738	Policy 12	In the absence of a more appropriate allocation regime (which the submitter	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 71759			requests) there is support for the guidance in Policy 12 so it should be RETAINED .		
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9798	Policy 12	AMEND Policy 12 to read: "Consider the contribution made by a point source discharge to the nitrogen, phosphorus, sediment and microbial pathogens catchment loads and the impact of that contribution on the likely achievement of the short term targets in Objective 3 or the progression towards the 80-year targets in Objective 1, <u>so that these objectives are not compromised</u> , taking into account..."	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10609	Policy 12	AMEND Policy 12 to read: "Policy 12: Additional considerations for point source discharges in relation to water quality targets Consider <u>Assess</u> the contribution made by a point source discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads and the impact of that contribution on the likely achievement of the short term targets ^Δ in Objective 3 or the progression towards the <u>desired 80-year water quality states</u> targets ^Δ in Objective 1, taking into account.. c. The ability to stage future mitigation actions to allow investment costs to be spread over time and <u>contribute to meeting Objectives 1 and 3</u> the water quality targets ^Δ specified above ; and..."	Support	FFNZ considers that the amendments proposed by the submitter is improvements to the proposed text but FFNZ will still seek amendments to address concerns with its view on long term targets.
Fulton Hogan Limited	PC1-10749	Policy 12	AMEND Policy 12 to read: " Consider <u>Assess</u> the contribution made by a ... on the likely achievement of the short term "	Support	FFNZ considers that the amendments proposed by the submitter is improvements to the proposed text but FFNZ will still seek amendments to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 74048			<p>targets in Objective 3 or the progression towards the <u>desired</u> 80-year <u>water quality states</u> targets in Objective 1, taking into account:</p> <p>...</p> <p>c) The ability to stage future mitigation actions to allow investment costs to be spread over time and <u>contribute to meeting Objectives 1 and 3</u> the water quality targets specified above; and..."</p>		address concerns with its view on long term targets.
GBC Winstone Submitter ID: 73992	PC1-2958	Policy 12	<p>AMEND Policy 12 to read: "<u>Consider</u>Assess the contribution made by point source discharge... on the likely achievement of the short term or targets in Objective 3 or the progression towards the <u>desired</u> 80 year <u>water quality states</u>targets in Objective 1, taking into account:...</p> <p>c. The ability to stage future mitigation... to be spread over time and <u>contribute to meeting Objectives 1 and 3</u> the water quality targets specified above; and..."</p>	Support	FFNZ considers that the amendments proposed by the submitter is improvements to the proposed text but FFNZ will still seek amendments to address concerns with its view on long term targets.
Genesis Energy Limited Submitter ID: 74052	PC1-8805	Policy 12	RETAIN Policy 12.	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
Graymont (NZ) Limited Submitter ID: 73954	PC1-2843	Policy 12	RETAIN Policy 12.	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
Hamilton City Council Submitter ID: 74051	PC1-10843	Policy 12	<p>AMEND Policy 12 to read as: "<u>When considering consent applications for point source discharges, Consider</u> the contribution made by a point source discharge to the nitrogen, phosphorus, sediment and microbial pathogen</p>	Support in part	FFNZ shares the submitter's concern that the numeric attribute states do not take into account or provide for anomalies or spikes e.g. flood or other unforeseeable events that is not a trend. FFNZ agrees that the numeric targets ought to be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>catchment loads and the impact of that contribution on the likely achievement of the short term targets in Objective 3 or the progression towards the 80-year targets in Objective 1, taking into account <u>where applicable</u>;</p> <p>a. The relative proportion of nitrogen, phosphorus, sediment or microbial pathogens that the particular point source discharge contributes to the catchment load; and</p> <p>b. Past <u>modelling, monitoring and technology upgrades undertaken to model, monitor understand</u> and reduce the discharge of nitrogen, phosphorus, sediment or microbial pathogens within the previous consent term; and [no change to c) and d)]</p> <p>e. <u>Seasonal climatic conditions affect biological processes within water bodies and wastewater treatment plants, which means the contaminant assimilative capacity of the waterbodies and the contaminant reducing capacity of the plants change with the seasons; and</u></p> <p>f. <u>Other natural processes within waterbodies that affect the waterway's capacity to assimilate contaminants."</u></p>		<p>amended to reasonably provide for seasonal this or there should be provision to account for these consideration. However FFNZ considers that seasonal climate and conditions and other natural processes will also be relevant for diffuse discharges and should be considerations for diffuse discharge as well to be consistent.</p>
J Swap Ltd Submitter ID: 71618	PC1-6429	Policy 12	<p>AMEND Policy 12 as follows - "Consider Assess the contribution made by a point source discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads and the impact of that contribution on the likely achievement of the short term or targets in Objective 3 or</p>	Support	<p>FFNZ considers that the amendments proposed by the submitter is improvements to the proposed text but FFNZ will still seek amendments to address concerns with its view on long term targets.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			the progression towards the <u>desired</u> 80 year <u>water quality</u> state targets in Objective 1, taking into account: ... c. The ability to stage future mitigation actions to allow investment costs to be spread over time and <u>contribute to meeting Objectives 1 and 3</u> the water quality targets specified above ; and"		
King Country Energy Limited Submitter ID: 60693	PC1-7926	Policy 12	RETAIN Policy 12. AND MAKE any similar amendments with like effect. AND MAKE any consequential amendments.	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
Lakes and Waterways Action Group Trust (LWAG) Submitter ID: 53342	PC1-4080	Policy 12	AMEND Policy 12 to define short and long term targets for Waste Water Treatment Plants. AND CONSIDER increasing Waikato Regional Council resources to support the consent renewal process such that the defined short and long term targets in PPC1 are complied with.	Support in part	FFNZ agrees that waste water treatment plants should also contribute to the improvement and management of water quality.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-9996	Policy 12	AMEND Policy 12 to read: " <u>When determining a resource consent application for a point source discharge for nitrogen, phosphorus sediment and microbial pathogens, consider the contribution may by a the point source discharge...</u> "	Support	FFNZ agrees that the additional text would provide more clarity for plan users.
Matamata-Piako District Council Submitter ID: 73419	PC1-3508	Policy 12	AMEND Policy 12 to add the following text: " <u>When considering consent applications for point source discharges, consider the contribution made...</u> "	Support	FFNZ agrees that the additional text would provide more clarity for plan users.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Mercury NZ Limited Submitter ID: 73182	PC1-9576	Policy 12	RETAIN Policy 12.	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
New Zealand Steel Ltd Submitter ID: 73790	PC1-3717	Policy 12	AMEND Policy 12 as follows: " <u>When determining a resource consent application for a point source discharge for nitrogen, phosphorus, sediment and microbial pathogens, consider the contribution made by a the point source discharge...</u> "	Support	FFNZ agrees that the additional text would provide more clarity for plan users.
Oil Companies Submitter ID: 73716	PC1-2596	Policy 12	AMEND Policy 12 to ensure that the policy framework (particularly policies 10-13) is applied to target only to the rural environment/farming activities. Several options are presented: Option A: RETAIN Policies 3.11.3.10 to 3.11.3.13 without modification AND AMEND the Introduction to Chapter 3.11 Area covered by Chapter 3.11/Nga Riu o nga Awa o Waikato me Waipā to read: "This Chapter 3.11 applies to the... This Chapter is additional to all other parts of the Plan. Where there are any inconsistencies, Chapter 3.11 prevails. <u>This Chapter only applies to discharges from pastoral land.</u> " Option B: RETAIN Policies 3.11.3.10 to 3.11.3.13 without modification and include an introduction/advice note at the beginning of the Policies section (3.11.3) to read: "3.11.3 Policies/Nga Kaupapa Here. <u>The following policies apply to applications involving discharges from pastoral farm land only.</u> " Option C: AMEND Policies 3.11.3.10 to 3.11.3.13 to ensure that they only apply	Oppose	One of FFNZ's fundamental principles is consistency in approach between point source and diffuse discharges; urban and rural. Accordingly FFNZ opposes narrowing application of provisions to only focus on discharges from pastoral land.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>to discharges from pastoral farm land to read: "Policy 10 Provide for point source discharges of regional significance... When deciding resource consent... microbial pathogens to water or onto or into land <u>from pastoral farm land</u>, provide for the... Policy 11 Applications to Best Practicable Option and Mitigation....Require any person undertaking point source discharge....Waikato and Waipā River catchments <u>from pastoral farm land</u> to adopt the Best Practicable... Policy 12 Additional considerations for point source discharges <u>from pastoral farm land</u> in relation to water quality targets... Policy 13 Point source consent duration..."</p>		
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6551	Policy 12	<p>DELETE Policy 12 OR AMEND Policy 12 to read: "...In assessing consent application for <u>point source discharges take into account: Consider the contribution made by a point source discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads and the impact of that contribution on the likely achievement of the short term targets in Objective 3 or the progression towards the 80 year targets in Objective 4, taking into account:</u> a. The relative proportion of nitrogen, phosphorus, sediment or microbial pathogens that the particular point source</p>	Oppose in part	<p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality , amongst others.</p> <p>FFNZ have concerns with the the submitter's proposed amendments at policy 12d. because not all plant upgrades will have a diminishing return. FFNZ consider it should be 'treatment plants' or alternatively for consistency should apply to diffuse discharge and include not just</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>discharge contributes to the catchment load; and</p> <p>b. Past technology upgrades undertaken to model, monitor and reduce the discharge of nitrogen, phosphorus, sediment or microbial pathogens within the previous consent term <u>and for new point source discharges the application of the best practicable option;</u> and</p> <p>c. The ability to stage future mitigation actions to allow investment costs to be spread over time <u>or occur at point in time and meet the water quality targets specified above;</u> and</p> <p>d. The diminishing return on investment in treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option.</p> <p>e. <u>for new or expanded regionally significant industry, the social and economic benefits of the proposal including the extent to which a net increase in low discharging land uses create a net benefit to the environmental health of the river(s)."</u></p>		<p>plant but also to upgrades in operations and machinery used for primary industry.</p>
<p>Pamu Farms of New Zealand Submitter ID: 74000</p>	<p>PC1-5968</p>	<p>Policy 12</p>	<p>AMEND Policy 12, 10, 11, and 13 to balance the costs and uncertainties between all emitters and avoid inappropriate protective treatment of any sector.</p>	<p>Support</p>	<p>One of FFNZ's fundamental principles is consistency in approach between point source and diffuse discharges; urban and rural. FFNZ supports amendments that provide for the above.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Primary Land Users Group Submitter ID: 71427	PC1-11160	Policy 12	AMEND PPC1 to acknowledge past environmental initiatives undertaken by land managers AND AMEND to allow for staging of capital investment costs for all stakeholders AND AMEND to focus on contaminant significance on a sub-catchment basis.	Support	FFNZ agrees that past environmental mitigations undertaken is a relevant consideration. FFNZ agrees with an approach that targets contaminants at a sub-catchment.
Rotorua Lakes Council Submitter ID: 73373	PC1-2510	Policy 12	RETAIN Policy 12.	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5724	Policy 12	AMEND Policy 12 so that all infrastructure, whether significant under this definition or not should be in play for making mitigations which are effective provided the mitigations do not force the infrastructure to be unfit for purpose either economic or physical.	Support in part	FFNZ agrees that significant regional infrastructure should also contribute to the management of discharges and FFNZ in its submissions on Variation 1 for policy 10 has sought amendments to reflect this.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11109	Policy 12	No specific decision sought for Policy 12.		FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
Stevenson Resources Limited Submitter ID: 73732	PC1-5028	Policy 12	AMEND Policy 12 to read: "Policy 12: Additional considerations for point source discharges in relation to water quality targets. Consider Assess the contribution made by a point source discharge to the, nitrogen, phosphorus, sediment and microbial pathogen catchment loads and the impact of that contribution on the likely achievement of the short term or targets in Objective 3 or the progression towards the desired 80 year water quality states targets in Objective 1, taking into	Support	FFNZ considers that the amendments proposed by the submitter is improvements but FFNZ will still seek amendments to address concerns with its view on long term targets.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			account... c. The ability to stage future mitigation actions to allow investment costs to be spread over time and <u>contribute to meet meeting Objectives 1 and 3</u> the water quality targets specified above ; and..."		
Taupo District Council Submitter ID: 74207	PC1-8116	Policy 12	RETAIN Policy 12.	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8304	Policy 12	AMEND Policy 12(a) to provide for shorter timeframes sought by the submission, AND DELETE Policy 12(b) or clarify that this only applies to existing regionally significant infrastructure.	Oppose in part	FFNZ already has concerns with the timeframes proposed and accordingly would oppose them being shortened.
Waikato District Council (WDC) Submitter ID: 73418	PC1-3132	Policy 12	RETAIN Policy 12.	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
Waikato Regional Council Submitter ID: 72890	PC1-3066	Policy 12	AMEND Policy 12 to read: " <u>e. That flood and drainage infrastructure is not contributing to catchment loads but conveying water for flood management purposes.</u> " AND AMEND Policy 12 to read: "Consider the contribution... on the likely achievement of the short term targets in Objective 3 <u>and the short term targets</u> in Table 3.11-1, or the progression towards the 80 year targets in Table 3.11-1 and Objective 1 taking into account:..." AND AMEND Policy 8(a) to read: "Sub-catchments where there is a greater gap between the water quality targets in	Oppose in part	FFNZ considers that there should be consistency in approach between point source and diffuse discharges; urban and rural. To the extent that farmers are required to reasonably identify and assess mitigations for critical source areas, flood management and drainage infrastructure should adopt a similar approach. FFNZ considers recognition should be given (for all) that there will be unforeseeable things that happen outside the landowner's control.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			Objective 1 (Table 3.11-1) and current water quality; ..."		
Waikato River Authority Submitter ID: 74033	PC1-11562	Policy 12	AMEND Policy 12 to include a provision stating that no further degradation shall be permitted.	Oppose	FFNZ in its submission on Variation 1 seeks the management of discharges rather than blanket prohibitions.
Waipa District Council Submitter ID: 67704	PC1-3163	Policy 12	RETAIN Policy 12.	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11352	Policy 12	AMEND Policy 12 to read: "Policy 12: Additional considerations for <u>diffuse or</u> point source discharges in relation to water quality targets... Consider the contribution made by a <u>diffuse or</u> point source discharge to... a. The relative proportion of nitrogen, phosphorus, sediment or microbial pathogens that the particular <u>diffuse or</u> point source discharge contributes to the catchment load; and"	Support	FFNZ supports provisions that treats diffuse discharge and point source discharge equally and proportionately.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2119	Policy 12	RETAIN Policy 12.	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.
Waitomo District Council Submitter ID: 73688	PC1-10320	Policy 12	RETAIN Policy 12. AND AMEND the Policies to address the policy disconnect between Policies 10 to 12 and Policy 6 [Policies 10 to 12 assume that certain discharges can have an adverse effect to a point and may increase, but Policy 6 does not make the same allowance].	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets. FFNZ supports provisions that treats diffuse discharge and point source discharge equally and proportionately.
Watercare Services Ltd	PC1-8151	Policy 12	RETAIN Policy 12. AND AMEND so that the applicants and decision makers are required to 'have	Support in part	FFNZ supports Policy 12 with amendments to reflect FFNZ's views on the long term targets.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 74077			particular regard to' the matters set out in Policy 12(a) to (d). AND AMEND Policy 12(b) to split into two parts. The first relating to technology upgrades and the second modelling and monitoring.		FFNZ considers that the current “taking into account” is the appropriate directive to decision makers. FFNZ considers that policy 12 b should not be split as not all past technology upgrades should be considered but only those upgrades for reducing the discharges and monitoring or modelling the discharges.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10900	Policy 13	DELETE Policy 13 OR AMEND to read: "Point source consent duration When determining an appropriate duration for any point source consent granted consider the following matters: a. <u>Alternative methods of discharge, technology improvements or other changed circumstances that may arise in the future</u> ; A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policies 11 and 12 will be met ; and aa. <u>The sensitivity of the receiving environment and the adequacy/certainty of information that is available</u> ; and ab. <u>The applicant's past record of responsiveness to adverse effects including past technology upgrades undertaken to model, monitor and reduce the discharge of nitrogen, phosphorus, sediment or microbial pathogens within the previous consent term and their success</u> ; and b. The magnitude and significance of the investment made or proposed to be made in contaminant reduction measures	Oppose in part	FFNZ opposes the deletion of policy 13. FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges. FFNZ opposes the submitters proposed new Policy 13 a because amongst other reasons the ability to stage future mitigations is already covered by policy 12c. Further FFNZ is concerned with the speculative nature of what technology improvements may or may not arise and consider it is not a sound basis for deciding the term of a consent. FFNZ also oppose subparagraphs aa. and ab. as proposed by the submitter. These proposed amendments is not relevant for the duration of resource consent. FFNZ also opposes adding the word “substantial” to policy 13 c. FFNZ considers that any investment to reduce contaminants should be considered. FFNZ supports amendments to policy 13 so that it applies to diffuse discharges but FFNZ does not consider that it should align with sub-catchment progress reviews but rather for consistency should be determined by the same factors

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			and any resultant improvements in the receiving water quality; c. The need to provide appropriate certainty of investment where <u>substantial</u> contaminant reduction measures are proposed (including investment in treatment plant upgrades or land based application technology)." AND AMEND to include guidance on consent term for diffuse discharges which should be aligned with sub-catchment progress review timeframes as specified in Table 3.11-2.		(paragraph a.-c. in FFNZ's submission on Variation 1) as point source discharge.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6897	Policy 13	ADOPT Policy 13 as notified. AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	Support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Cameron, Bruce Submitter ID: 60603	PC1-6367	Policy 13	RETAIN the section of Policy 13 that requires consideration of the magnitude and significance of the investment made when determining the duration of a resource consent AND AMEND Policy 13 to include all property owners and enterprises in the Waikato and Waipā catchments.	Support	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Contact Energy Limited Submitter ID: 73714	PC1-7379	Policy 13	RETAIN Policy 13.	Support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Department of Conservation Submitter ID: 71759	PC1-10739	Policy 13	AMEND Policy 13 to include a common catchment expiry date for consent terms rather than a blanket 25 year consent term.	Oppose	FFNZ considers that there is no blanket or pre determined duration for consent in policy 13 and the factors in policy 13 a. to c. are appropriate for deciding the duration of resource consent rather than common catchment expiry dates.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9799	Policy 13	RETAIN Policy 13.	Support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10610	Policy 13	AMEND Policy 13 to read: "Policy 13: Point sources consent duration When determining an appropriate duration for any consent granted consider the following matters: a. A consent term exceeding 25 years, where the application demonstrates the approaches set out in that Policies 11, 11A and 12 will be met <u>complied with</u> ; and..."	Support	FFNZ considers the amendments improves the clarity of the provision.
Fulton Hogan Limited Submitter ID: 74048	PC1-10818	Policy 13	AMEND Policy 13 to read: "a) A consent term exceeding 25 of 35 years, where the applicant demonstrates the approaches set out in that Policies 11, 11A and 12 will be met <u>complied with</u> ; and..."	Support in part	FFNZ considers that a consent of 35 years should be possible in the right circumstances.
GBC Winstone Submitter ID: 73992	PC1-2966	Policy 13	AMEND Policy 13 to read: "...a) A consent term exceeding 25 of 35 years, where the applicant demonstrates the approaches set out in that Policies 11, 11A and 12, will be met <u>complied with</u> ; and..."	Support in part	FFNZ considers that a consent of 35 years should be possible in the right circumstances.
Graymont (NZ) Limited Submitter ID: 73954	PC1-2844	Policy 13	RETAIN Policy 13.	Support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Hamilton City Council Submitter ID: 74051	PC1-11038	Policy 13	AMEND Policy 13 as follows: "c. The need to provide appropriate certainty of investment where contaminant reduction measures are	Support in part, oppose in part	In principle FFNZ supports that in the right circumstances a consent can obtain a consent for 35 years. However FFNZ does not consider it

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			proposed (including investment in treatment plant upgrades, or land based application technology, or offsets); and <u>d. In respect of a municipal discharge, in addition to a, b and c above, allow a consent term for a period of 35 years, where the proposed treatment of the water and any contaminants prior to discharge, and any offset measures, are predicted to ensure the standards specified in the consent will be met for the duration of the consent."</u>		should be a pathway specific for municipal discharges.
Huirimu Farms Ltd Submitter ID: 72582	PC1-5891	Policy 13	AMEND Policy 13 by shortening consent duration to allow for technology advances to be recognised. The timeframe for the short term water quality goals should coincide.	Oppose	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges. The ability to stage future mitigations is already covered by policy 12c. and accordingly shortening consent duration to allow for technology advances is considering it twice. Further it is pure speculation what technology improvements may or may not arise and it is not a sound basis for deciding the term of a consent. FFNZ also considers that the consent terms are more appropriately decided by the factors a.-c. of policy 13 than coinciding with short term water quality goals.
J Swap Ltd Submitter ID: 71618	PC1-6433	Policy 13	AMEND Policy 13 as follows - "When determining an appropriate duration for any consent granted consider the following matters: A consent term exceeding 25 of 35 years, where the applicant demonstrates the approaches set out in that Policies 11, 11A and 12, will be met <u>complied with</u> ; and ..."	Support in part	FFNZ considers that in the right circumstances a 35 year resource consent should be possible.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
King Country Energy Limited Submitter ID: 60693	PC1-7928	Policy 13	RETAIN Policy 13. AND MAKE any similar amendments with like effect. AND MAKE any consequential amendments.	Support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-9998	Policy 13	RETAIN Policy 13.	Support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9300	Policy 13	AMEND Policy 13 to read: "When determining the... a. A consent term exceeding 25 years, where The applicant demonstrates the approaches..."	Oppose	FFNZ considers signalling that a consent of over 25 years is possible if policy 13 matters are complied with is appropriate and helpful.
Matamata-Piako District Council Submitter ID: 73419	PC1-3509	Policy 13	AMEND Policy 13 to refer to 30 years in clause a. and to read as follows: "When determining an appropriate duration for any consent granted consider the following matters: a. A consent term exceeding 25 <u>30</u> years, where..." AND AMEND the policy in clause b. as follows: "b. The magnitude and significance of the investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality while taking into account the <u>timing and cost to the communities associated with implementing such measures.</u> "	Support in part	FFNZ considers that a consent of 30 years should be possible in the right circumstances.
Mercury NZ Limited Submitter ID: 73182	PC1-9577	Policy 13	AMEND Policy 13 to read: "When determining an appropriate duration for any consent granted <u>for point source discharges</u> , consider the following matters:..."	Oppose	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Oil Companies Submitter ID: 73716	PC1-2595	Policy 13	<p>AMEND Policy 13 to ensure that the policy framework (particularly policies 10-13) is applied to target only to the rural environment/farming activities.</p> <p>Several options are presented: Option A: RETAIN Policies 3.11.3.10 to 3.11.3.13 without modification AND AMEND the Introduction to Chapter 3.11 Area covered by Chapter 3.11/Nga Riu o nga Awa o Waikato me Waipā to read: "This Chapter 3.11 applies to the... This Chapter is additional to all other parts of the Plan. Where there are any inconsistencies, Chapter 3.11 prevails. <u>This Chapter only applies to discharges from pastoral land.</u>"</p> <p>Option B: RETAIN Policies 3.11.3.10 to 3.11.3.13 without modification and include an introduction/advice note at the beginning of the Policies section (3.11.3) to read: "3.11.3 Policies/Nga Kaupapa Here. <u>The following policies apply to applications involving discharges from pastoral farm land only.</u>"</p> <p>Option C: AMEND Policies 3.11.3.10 to 3.11.3.13 to ensure that they only apply to discharges from pastoral farm land to read: "Policy 10 Provide for point source discharges of regional significance... When deciding resource consent... microbial pathogens to water or onto or into land <u>from pastoral farm land</u>, provide for the... Policy 11 Applications to Best Practicable Option and Mitigation....Require any</p>	Oppose	One of FFNZ's fundamental principles is consistency in approach between point source and diffuse discharges; urban and rural. Accordingly FFNZ opposes narrowing provisions to only focus on discharges from pastoral land. It would be contrary to the principles of the Vision & Strategy.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			person undertaking point source discharge....Waikato and Waipā River catchments <u>from pastoral farm land</u> to adopt the Best Practicable... Policy 12 Additional considerations for point source discharges <u>from pastoral farm land</u> in relation to water quality targets... Policy 13 Point source consent duration..."		
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6561	Policy 13	REMOVE Policy 13 (a).	Oppose	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges. FFNZ considers that policy 13a) is a relevant matter to assist in deciding the duration of resource consent.
Pamu Farms of New Zealand Submitter ID: 74000	PC1-5969	Policy 13	DELETE Policy 13 OR provide a similar level of recognition and protection for non-point sources.	Oppose in part, support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Primary Land Users Group Submitter ID: 71427	PC1-11161	Policy 13	AMEND Policy 13 to ensure the same considerations are reflected for all stakeholders within PPC1.	Oppose in part, support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10558	Policy 13	AMEND Policy 13 to read: "When determining the... a. A consent term exceeding 25 years, where The applicant demonstrates the approaches..."	Oppose in part	FFNZ considers that a signal that a resource consent could exceed 25 years for matters in policy 13 a) is a sensible and appropriate guide.
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5733	Policy 13	AMEND Policy 13 by reducing the timeframe to 10 years with 10 year automatic rollover if audits are clean.	Oppose	FFNZ oppose inappropriately short resource consent and considers that the matters set out in policy 13a. – c. is relevant matters to consider the duration of a resource consent rather than enduring the uncertainty of short terms consents at significant delays and costs.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11110	Policy 13	No specific decision sought for Policy 13.		FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
South Waikato District Council Submitter ID: 72892	PC1-4095	Policy 13	AMEND Policy 13(a) to read: "When determining an appropriate duration for any consent granted consider the following matters: a. A consent term exceeding 25 <u>30</u> years, where..." AND AMEND Policy 13(b) to read: "The magnitude and significance of the investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality <u>while taking into account the timing and cost to the communities associated with implementing such measures.</u> "	Support in part	FFNZ considers that a term of 30 years should be possible in the right circumstances.
Stevenson Resources Limited Submitter ID: 73732	PC1-5747	Policy 13	AMEND Policy 13 to read: "Policy 13: Point sources consent duration when determining an appropriate duration for any consent granted, consider the following matters: a) A consent term exceeding 25 of <u>35</u> years, where the applicant demonstrates the approaches set out in that Policies 11, 11A and 12, will be met <u>complied with</u> ; and..."	Support in part	FFNZ considers that a term of 35 years should be possible in the right circumstances.
Taupo District Council Submitter ID: 74207	PC1-8117	Policy 13	AMEND Policy 13 to ensure the consent term is 35 years.	Support in part	FFNZ considers that a term of 35 years should be possible in the right circumstances.
Te Arawa River Iwi Trust	PC1-11790	Policy 13	AMEND Policy 13 to read: "When determining the..."	Oppose	FFNZ considers signalling that a consent of over 25 years is possible if policy 13 a matters are complied with is appropriate and helpful.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73697			a. A consent term exceeding 25 years, where The applicant demonstrates the approaches..."		
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8325	Policy 13	AMEND Policy 13 to read as follows: "Policy 13: Point sources consent duration. When determining an appropriate duration for any consent granted consider the following matters: a. A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policies 11 and 12 will be met; and whether the applicant demonstrates that the discharge is consistent with the water quality attribute targets set out in Table 3.11-1; b. the magnitude and significance of the investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality; and c. the need to provide appropriate certainty of investment where contaminant reduction measures are proposed (including investment in treatment plant upgrades or land based application technology)."	Oppose	FFNZ considers signalling that a consent of over 25 years is possible if policy 13 a matters are complied with is appropriate and helpful.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10354	Policy 13	AMEND Policy 13 to read: "When determining the... a. A consent term exceeding 25 years, where The applicant demonstrates the approaches..."	Oppose	FFNZ considers signalling that a consent of over 25 years is possible if policy 13 a matters are complied with is appropriate and helpful.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3403	Policy 13	AMEND Policy 13 to read: "When determining the..."	Oppose	FFNZ considers signalling that a consent of over 25 years is possible if policy 13 a matters are complied with is appropriate and helpful.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			a. A consent term exceeding 25 years, where the The applicant demonstrates the approaches..."		
Waikato District Council (WDC) Submitter ID: 73418	PC1-3137	Policy 13	RETAIN Policy 13.	Support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Waikato Federated Farmers Meat & Fibre Industry Group Submitter ID: 73934	PC1-2711	Policy 13	AMEND PPC1 to give non-point source discharges the same level of certainty as point source discharges.	Support	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Waikato Regional Council Submitter ID: 72890	PC1-3095	Policy 13	AMEND Policy 13(a) to read: "A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policies <u>Policy 11 and 12</u> will be met; and..."	Support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Waipa District Council Submitter ID: 67704	PC1-3164	Policy 13	RETAIN Policy 13.	Support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11353	Policy 13	AMEND Policy 13 to read: "Policy 13: <u>Diffuse or p</u> Point sources consent duration..."	Support	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2120	Policy 13	RETAIN Policy 13.	Support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.
Waitomo District Council Submitter ID: 73688	PC1-10321	Policy 13	RETAIN Policy 13.	Support in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Watercare Services Ltd Submitter ID: 74077	PC1-8337	Policy 13	RETAIN Policy 13. AND AMEND Policy 13 to clarify that matters a) to c) must be considered when determining the duration of any resource consent. AND AMEND Policy 13 a) to clarify that consent applicants are required to demonstrate the extent to which Polices 11 and 12 will be met. AND AMEND to include the need to provide infrastructure to meet servicing requirements for long-term growth. AND AMEND Policy 13 to reflect best practice RMA policy drafting.	Support in part, oppose in part	FFNZ supports the retention of policy 13 with amendments so that it applies to both point source and diffuse discharges. FFNZ considers that the matters in policy 13 a.-c. are appropriate considerations for duration and FFNZ opposes special treatment for infrastructure for servicing requirements.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10903	Policy 14	AMEND Policy 14 to ensure it directs maintenance, or where degraded, enhancement during the period of PPC1 operation AND AMEND to apply standards and targets based on appropriate attributes such as Trophic Level Indicator and ensure they are shown in the attribute table for individual sites within the Lakes Freshwater Management Units AND AMEND to produce and include appropriate standards and targets for wetlands and wetland Freshwater Management Units.	Support in part, Oppose in part	FFNZ seeks clarification that the lakes are being managed, restored and/or protected as not always will the lakes require restoration. FFNZ notes that th submitters seeks a very similar clarification although FFNZ prefers its suggested text. As explain in its submission son Variation 1 FFNZ is not convinced that the lake FMUs are the appropriate spatial scale. FFNZ considers that a tailored lake-by-lake approach guided by Lake Catchment Plans is more appropriate than blankets standards and targets.
Buckley, Peter Ross Submitter ID: 71423	PC1-1413	Policy 14	RETAIN Policy 14.	Support in part	NZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
Cameron, Bruce Submitter ID: 60603	PC1-6372	Policy 14	RETAIN Policy 14.	Support in part	<p>NZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
Department of Conservation Submitter ID: 71759	PC1-10742	Policy 14	AMEND Policy 14 to require that the restoration of lakes be implemented using existing data and information from work already completed to avoid further delay in improving lake water quality.	Support in part	<p>NZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					FFNZ supports a method which provides for specific studies, data collection, catchment group facilitation, development and funding of sub-catchment models which support catchment groups.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9800	Policy 14	AMEND Policy 14 to read: " Restore and <u>Protect and where degraded restore</u> lakes by 2096 through the implementation of a tailored lake-by-lake approach, guided but Lake Catchment Plans prepared over the next 10 years..."	Support in part	<p>NZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word "maintain" because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
King Country Energy Limited Submitter ID: 60693	PC1-7929	Policy 14	RETAIN Policy 14. AND MAKE any similar amendments with like effect. AND MAKE any consequential amendments.	Support	<p>NZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-10000	Policy 14	RETAIN Policy 14 AND collect and make available data coming from all activities into the Lake Waikare catchment to enable the submitter to have a better understanding of what is happening in the Lake Catchment.	Support	<p>FFNZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale. FFNZ supports a method which provides for specific studies, data collection, catchment group facilitation, development and funding of sub-catchment models which support catchment groups.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9304	Policy 14	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."	Support	<p>FFNZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
Miraka Limited Submitter ID: 73492	PC1-8824	Policy 14	RETAIN Policy 14.	Support	<p>NZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11842	Policy 14	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."	Support	<p>FFNZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
NZ Transport Agency Submitter ID: 73542	PC1-4834	Policy 14	RETAIN Policy 14.	Support	<p>NZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
Raukawa Charitable Trust Submitter ID: 74073	PC1-10605	Policy 14	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."	Support	<p>FFNZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					<p>this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5643	Policy 14	REMOVE the timeframe in Policy 14. AND AMEND PPC1 to require best current practices to be used for all polluting activities. AND AMEND PPC1 to require the most polluting activities be subject to the greatest mitigation requirements, penalties, oversight, research, measurement and regulation. Ensure however that there is room to innovate mitigations as new practices and methods develop.	Oppose	<p>FFNZ agrees that the timeframe in Policy 14 ought to be removed.</p> <p>FFNZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ does not agree with more stringent targets or objectives being imposed on farmers and FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment.</p>
Stark, Steven and Theresa Submitter ID: 73721	PC1-5129	Policy 14	RETAIN Policy 14 in its current form.	Support in part	<p>FFNZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11791	Policy 14	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."	Support in part	<p>FFNZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8335	Policy 14	REPLACE "2096" with "2050" in Policy 14.	Oppose	FFNZ opposes the reduction in the timeframe as FFNZ already has concerns with the current timeframe .
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10362	Policy 14	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the	Support in part	FFNZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."		<p>convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word "maintain" because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3404	Policy 14	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."	Support in part	<p>FFNZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word "maintain" because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
Waikato Federated Farmers Meat &	PC1-2672	Policy 14	AMEND Policy 14 to start lake restoration immediately and not in 1996, through implementation of a tailored lake-by-lake	Support in part	FFNZ agrees that a start should be made immediately but interprets the provisions to direct immediate work with restoration being done by

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Fibre Industry Group Submitter ID: 73934			approach, guided by Lake Catchment Plans prepared over the next 10 years. AMEND PPC1 to deal with Koi Carp.		<p>2096. FFNZ in its submissions to Variation 1 seeks a further amendment to make it clear that Vision & Strategy and values should be given effect by 2096. Accordingly, FFNZ iopposes the reduction in the timeframe as FFNZ already has concerns whether it is even possible by 2096.</p> <p>NZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ agrees that koi carp and pest fish controls ought to be investigated and pursued.</p>
Waikato Regional Council Submitter ID: 72890	PC1-3097	Policy 14	RETAIN Policy 14.	Support in part	<p>NZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
Wairakei Pastoral Ltd	PC1-11354	Policy 14	RETAIN Policy 14 as notified or amended by similar wording to like effect.	Support in part	NZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 74095					<p>convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2121	Policy 14	RETAIN Policy 14.	Support in part	<p>FFNZ supports adopting lake catchment plans to specifically understand and target water quality issues in the lakes, however, FFNZ is not convinced that the lake FMUs are the appropriate spatial scale.</p> <p>FFNZ seeks clarification that the lakes are being managed, restored and/or protected and without this qualification, it is not clear to what extent they are being restored or protected or for what purpose.</p> <p>For the reason above, FFNZ considers that it is important to include the word “maintain” because this is what they NPS-FM requires and will be the appropriate standard to the extent that is consistent with the Vision & Strategy or the Vision & Strategy does not apply.</p>
Auckland/Waikato Fish and Game and	V1PC1-261	Policy 15	RETAIN Policy 15	Oppose	FFNZ supports a tailored catchment management plan approach to Whangamarino

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Eastern Region Fish and Game Submitter ID: 74085			<p>AND AMEND to encompass the restoration and protection of all important wetland values and types within the Whangamarino Wetland complex.</p> <p>AND AMEND to include specific short-term and long-term targets for restoration.</p> <p>AND AMEND to expand the focus to include the effects of changes in extent and hydrology.</p> <p>AND AMEND to read: 'Protect and make progress towards restoration of <u>restore</u> the Whangamarino Wetland by:</p> <p><u>a. Reducing the discharge of nitrogen, phosphorous, sediment and microbial pathogens in the sub-catchments that flow into the wetland to; and</u></p> <p><u>b. Reduce and minimise Avoiding further loss of the bog ecosystem; and</u></p> <p><u>c. Managing the hydrological regime including the impacts of the Lower Waikato Waipā Flood Control Scheme, to:</u></p> <p><u>a. Restore and protect wetland values within the Whangamarino Wetland complex; and</u></p> <p><u>b. Provide increasing availability of mahinga kai; and</u></p> <p><u>c. Support implementation of any Implement a catchment plan prepared in future by Waikato Regional Council that covers Whangamarino Wetland.'</u></p>		<p>Wetland that coordinates whole of catchment and community actions to maintain, restore and/or protect the wetland and assist with giving effect to the Vision & Strategy and the values[^]. FFNZ considers that this is best addressed by adopting similar wording to Policy 14 taking into account FFNZ reasons given for Policy 14.</p> <p>FFNZ is very concerned about the specific wording of paragraphs a to c effectively pre-determining a sub-catchment management planning process (including sub-catchment forensics and whole community engagement). It effectively pre-determines some of the steps set out in Method 3.11.4.</p> <p>For these reasons FFNZ seeks the deletion of paragraphs a to c and the adopting of wording similar to Policy 14 (see FFNZ's submission on Variation 1 in respect of Policy 15).</p>
Balle Bros Group Submitter ID: 67834	V1PC1-170	Policy 15	AMEND Policy 15 to acknowledge the contribution that pest fish species make	Oppose in part	FFNZ agrees that pest fish controls ought to be investigated and pursued; however, FFNZ does not agree with more stringent targets or

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			to the turbidity and resuspension of nutrients within the system AND AMEND Policy 15 to require the reduction, where necessary, of each of the four contaminants to ensure that contaminant loads both entering and leaving Whangamarino Wetland are consistent with the achievement of the water quality attribute targets in Table 3.11.1 AND PROVIDE allocation of adequate funding within Waikato Regional Council to support the implementation of a catchment plan for the Whangamarino Wetland if this is to be reflected in Policy 15.	Support in part	objectives being imposed and FFNZ supports an approach that considers all sources of contaminants and is tailored and proportionate to the water quality issues in each sub-catchment. FFNZ supports provisions that enable funding to assist with water quality improvements.
Beef + Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1717	Policy 15	AMEND so that Policy 15: <ul style="list-style-type: none"> maintains water quality and habitat health, where it currently meets the water quality outcomes/objectives, and or values; and Improves the water quality and habitat where it does not achieve numerical outcomes or values.	Oppose	FFNZ supports a tailored catchment management plan approach to Whangamarino Wetland that coordinates whole of catchment and community actions to maintain, restore and/or protect the wetland and assist with giving effect to the Vision & Strategy and the values^. FFNZ considers that this is best addressed by adopting similar wording to Policy 14 taking into account FFNZ reasons given for Policy 14. For these reasons FFNZ seeks the deletion of paragraphs a to c and the adopting of wording similar to Policy 14 (see FFNZ's submission on Variation 1 in respect of Policy 15).
Department of Conservation Submitter ID: 71759	V1PC1-405	Policy 15	RETAIN Policy 15. AND AMEND to ensure the policy recognises all important wetland values and the complex nature of Whangamarino Wetland. AND AMEND to refer to both short-term and long-term restoration.	Oppose	FFNZ supports a tailored catchment management plan approach to Whangamarino Wetland that coordinates whole of catchment and community actions to maintain, restore and/or protect the wetland and assist with giving effect to the Vision & Strategy and the values^. FFNZ considers that this is best addressed by adopting

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			<p>AND AMEND to ensure that targets are set to:</p> <ul style="list-style-type: none"> • Reduce high rates of sediment deposition in the wetland, including swamp, marsh, fen and bog wetland types • Reduce the load of P transported into the wetland • Ensure water levels are ecologically appropriate in that they do not exacerbate water quality effects, and also protect critical habitats • Ensure any impacts of the Lower Waikato/Waipā Flood Control Scheme are avoided, remedied or mitigated so as not to adversely affect the sustainable management of the Whangamarino Wetland • Promote the natural succession of the wetland system, allowing for natural peat-land (bog) development (no further loss of bog). <p>AND AMEND to include clear and strengthened wording around protection and restoration of the Whangamarino Wetland by avoiding further loss of the bog ecosystem.</p> <p>AND AMEND Policy 15's first sentence to read: 'Protect and make progress towards restoration of <u>and restore</u> the Whangamarino Wetland by reducing</p>		<p>similar wording to Policy 14 taking into account FFNZ reasons given for Policy 14.</p> <p>FFNZ is very concerned about the specific wording of paragraphs a to c effectively pre-determining a sub-catchment management planning process (including sub-catchment forensics and whole community engagement). It effectively pre-determines some of the steps set out in Method 3.11.4.</p> <p>For these reasons FFNZ seeks the deletion of paragraphs a to c and the adopting of wording similar to Policy 14 (see FFNZ's submission on Variation 1 in respect of Policy 15).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			the discharge of nitrogen, phosphorus, sediment and microbial pathogens in the sub-catchments that flow into the wetland to' AND AMEND subsection (a) to read: 'Reduce and minimise <u>Avoid</u> further loss of the bog ecosystem; and'		
Ravensdown Limited Submitter ID: 74058	V1PC1-273	Policy 15	AMEND Policy 15 as follows; " Protect and make progress towards restoration of <u>Restore</u> Whangamarino Wetland by reducing the discharge of nitrogen, phosphorus, sediment and microbial pathogens in the sub-catchments that flow into the wetland to:... "	Support in part	FFNZ supports a tailored catchment management plan approach to Whangamarino Wetland that coordinates whole of catchment and community actions to maintain, restore and/or protect the wetland and assist with giving effect to the Vision & Strategy and the values [^] . FFNZ considers that this is best addressed by adopting similar wording to Policy 14 taking into account FFNZ reasons given for Policy 14. For these reasons FFNZ seeks the deletion of paragraphs a to c and the adopting of wording similar to Policy 14.
Waikato and Waipa River Iwi Submitter ID: 74035	V1PC1-542	Policy 15	AMEND Policy 15 to read: Protect and make progress towards restoration of <u>restore the</u> Whangamarino Wetland by reducing... ... c. Support implementation of any <u>Provide the necessary resources to fully implement the catchment plan prepared in future</u> by the Waikato...	Oppose in part	FFNZ supports a tailored catchment management plan approach to Whangamarino Wetland that coordinates whole of catchment and community actions to maintain, restore and/or protect the wetland and assist with giving effect to the Vision & Strategy and the values [^] . FFNZ considers that this is best addressed by adopting similar wording to Policy 14 taking into account FFNZ reasons given for Policy 14. For these reasons FFNZ seeks the deletion of paragraphs a to c and the adopting of wording similar to Policy 14 (see FFNZ's submission on Variation 1 in respect of Policy 15).
Waikato Regional Council Submitter ID: 72890	V1PC1-181	Policy 15	RETAIN Policy 15 provisions relating to Whangamarino Wetland.	Support in part	FFNZ supports a tailored catchment management plan approach to Whangamarino Wetland that coordinates whole of catchment and community actions to maintain, restore and/or

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					protect the wetland and assist with giving effect to the Vision & Strategy and the values^. FFNZ considers that this is best addressed by adopting similar wording to Policy 14 taking into account FFNZ reasons given for Policy 14. For these reasons FFNZ seeks the deletion of paragraphs a to c and the adopting of wording similar to Policy 14 (see FFNZ's submission on Variation 1 in respect of Policy 15).
Wairakei Pastoral Ltd Submitter ID: 74095	V1PC1-664	Policy 15	RETAIN Policy 15 OR AMEND by similar wording to like effect.	Support in part	FFNZ supports a tailored catchment management plan approach to Whangamarino Wetland that coordinates whole of catchment and community actions to maintain, restore and/or protect the wetland and assist with giving effect to the Vision & Strategy and the values^. FFNZ considers that this is best addressed by adopting similar wording to Policy 14 taking into account FFNZ reasons given for Policy 14. For these reasons FFNZ seeks the deletion of paragraphs a to c and the adopting of wording similar to Policy 14 (see FFNZ's submission on Variation 1 in respect of Policy 15).
AFFCO New Zealand Limited Submitter ID: 74140	PC1-7664	Policy 16	REPLACE references to 'BMP' and 'GMP' with 'BPO'. AND AMEND Policy 16 to read as follows: "Best practicable options management practice actions for nitrogen, phosphorus, sediment and microbial pathogens for..."	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Cameron, Bruce Submitter ID: 60603	PC1-6374	Policy 16	RETAIN Policy 16. AND AMEND PPC1 to reflect Policy 16. AND CONSIDER a similar flexibility for all property owners and enterprises.	Oppose	FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					and supports an effects based regime. FFNZ agrees that a framework which provides better flexibility for all landowners and therefore equity or consistency in approach is more appropriate.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10785	Policy 16	RETAIN Policy 16 as currently worded.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
DairyNZ Submitter ID: 74050	PC1-10238	Policy 16	RETAIN Policy 16	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Department of Conservation Submitter ID: 71759	PC1-10745	Policy 16	RETAIN Policy 16 AND AMEND Policy 16 and PPC1 to include a land-based allocation regime.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach. FFNZ is also concerned that allocation to land refers to property. If so, FFNZ does not support allocation of contaminants to a property level and instead supports a holistic sub-catchment

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					approach that considers all sources of contaminants and tailored actions to address those in a proportionate and reasonable manner.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9801	Policy 16	AMEND Policy 16 to refer to Good Management Practice rather than Best Practice Management.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Gleeson, Graeme B Submitter ID: 73800	PC1-6455	Policy 16	DELETE Policy 16.	Support	FFNZ agrees that Policy 16 ought to be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5707	Policy 16	AMEND Policy 16 by enabling flexibility of land use for all landowners within reasonable constraints. In conjunction with other amendments this policy may be unnecessary.	Support in part	FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ agrees that a framework which provides better flexibility for all landowners and therefore equity or consistency in approach is more appropriate.
J Swap Ltd Submitter ID: 71618	PC1-6434	Policy 16	AMEND Policy 16 to provide greater guidance on the terms 'Good Management Practice' and 'Best Management Practice' or replace references to them 'Best Practicable Option'.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			AND AMEND to include a definition of 'Best Practicable Option', in respect of diffuse source discharges, and guidance material as a Schedule to PPC1.		flexibility for all landowners and therefore equity or consistency in approach.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9307	Policy 16	RETAIN Policy 16.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Matamata-Piako District Council Submitter ID: 73419	PC1-3511	Policy 16	AMEND Policy 16 to make the intention and scope of the policy clear.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Mercury NZ Limited Submitter ID: 73182	PC1-9578	Policy 16	RETAIN Policy 16.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Miraka Limited Submitter ID: 73492	PC1-8829	Policy 16	REMOVE clauses ii and iii from Policy 16.	Support in part	FFNZ opposes Policy 16 and seeks that it be deleted in its entirety. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach. FFNZ opposes Policy 16 and seeks that it be deleted in its entirety. On this basis that FFNZ also seeks ii and iii deleted it supports the submission point.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6560	Policy 16	DELETE Policy 16.	Support	FFNZ agrees that Policy 16 ought to be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10608	Policy 16	RETAIN Policy 16.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Ravensdown Limited Submitter ID: 74058	PC1-10122	Policy 16	RETAIN the intent of Policy 16 as it is currently written. AND AMEND clause i. to refer to "Good Management Practices" rather than 'Best Management Practices'.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Rotorua Lakes Council	PC1-2512	Policy 16	AMEND Policy 16 to read:	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73373			"... <u>land use change that enables the development of tangata whenua ancestral lands shall be managed in a way that recognises and provides for (in increasing order of priority):...</u> " AND MAKE any consequential amendments.		FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
South Waikato District Council Submitter ID: 72892	PC1-4098	Policy 16	AMEND Policy 16 to ensure the intention and scope of the policy is clear AND AMEND to ensure that the matters listed under i-iii are consistent with Policy 7.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Stark, Steven and Theresa Submitter ID: 73721	PC1-5132	Policy 16	DELETE Policy 16 in its entirety.	Support	FFNZ agrees that Policy 16 ought to be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11792	Policy 16	RETAIN Policy 16.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
The Royal Forest and Bird Protection	PC1-8336	Policy 16	DELETE Policy 16.	Support	FFNZ agrees that Policy 16 ought to be deleted. FFNZ opposes Policy 16 as set out in FFNZ's

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Society of New Zealand Incorporated Submitter ID: 74122					submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10364	Policy 16	RETAIN Policy 16.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3405	Policy 16	RETAIN Policy 16.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Waikato Dairy Leaders Group Submitter ID: 74049	PC1-11013	Policy 16	RETAIN policy guidance for Non-Complying consent applications to change land use on tangata whenua ancestral land AND RETAIN the provision that farm management and mitigation practices on the changed land use apply the most up to date technology and knowledge to minimise contaminant discharge AND AMEND to provide that any application for land use change on	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
			tangata whenua ancestral lands demonstrate that the resulting land use has as low environmental footprint as practicable.		
Waikato Federated Farmers Meat & Fibre Industry Group Submitter ID: 73934	PC1-2704	Policy 16	DELETE Policy 16.	Support	FFNZ agrees that Policy 16 ought to be deleted.
Waikato Regional Council Submitter ID: 72890	PC1-3098	Policy 16	RETAIN Policy 16.	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11355	Policy 16	AMEND Policy 16 to read: " <u>Best Adaptive Management and mitigation approaches for the sub-catchment are developed and implemented to support the management practice actions for nitrogen, phosphorus, sediment and microbial pathogens for the proposed new type of land use; and...</u> "	Oppose	FFNZ opposes Policy 16 and seeks that it be deleted. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore equity or consistency in approach.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2122	Policy 16	DELETE clauses ii and iii from Policy 16.	Support in part	FFNZ opposes Policy 16 and seeks that it be deleted in its entirety. FFNZ opposes Policy 16 as set out in FFNZ's submission on Variation 1, amongst others, because FFNZ considers that it is not appropriate to manage resources on the basis of ownership and supports an effects based regime. FFNZ seeks a framework which provides better flexibility for all landowners and therefore

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
					equity or consistency in approach. FFNZ opposes Policy 16 and seeks that it be deleted in its entirety. On this basis that FFNZ also seeks ii and iii deleted it supports the submission point.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10906	Policy 17	AMEND Policy 17 to remove the functioning of ecosystems and wetland values, and the enhancement of biodiversity OR AMEND to clarify that these are primary considerations/values integral to Chapter 3.11.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Buckley, Peter Ross Submitter ID: 71423	PC1-1414	Policy 17	RETAIN Policy 17 OR WITHDRAW PPC1 until the withdrawn area and the Vision and Strategy has been amended.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Cameron, Bruce Submitter ID: 60603	PC1-6375	Policy 17	RETAIN Policy 17. WITHDRAW PPC1 until the Hauraki Iwi area and the Vision and Strategy has been amended.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Department of Conservation Submitter ID: 71759	PC1-10746	Policy 17	AMEND Policy 17 to reflect the clear direction provided in higher level documents including the Resource Management Act, the National Policy Statement for Freshwater Management and the Vision and Strategy for Waikato and Waipā Rivers. AND DELETE all reference to the wording 'secondary benefit'.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9802	Policy 17	RETAIN Policy 17.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Fletcher Trust Submitter ID: 73848	PC1-5996	Policy 17	ADD to Policy 17 the following sub-paragraph (c): " <u>new science, methods and farming concepts to enhance farming in the region.</u> "	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Graymont (NZ) Limited Submitter ID: 73954	PC1-2847	Policy 17	RETAIN Policy 17.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-10007	Policy 17	AMEND Policy 17 to read: "When applying policies and methods in Chapter 3.11 to discharges of <u>nitrogen, phosphorus, sediment and microbial pathogens, seek opportunities...</u> "	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9310	Policy 17	RETAIN Policy 17.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Matamata-Piako District Council Submitter ID: 73419	PC1-3512	Policy 17	AMEND Policy 17 to make the intention and scope of the policy clear.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Mercury NZ Limited Submitter ID: 73182	PC1-9583	Policy 17	RETAIN Policy 17.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Miraka Limited Submitter ID: 73492	PC1-8838	Policy 17	RETAIN Policy 17	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
New Zealand Steel Ltd Submitter ID: 73790	PC1-3723	Policy 17	AMEND Policy 17 to restrict its application to the four contaminants as follows: " <u>When applying policies and methods in Chapter 3.11 to discharges of nitrogen, phosphorus, sediment and microbial pathogens, seek opportunities...</u> " AND AMEND Policy 17 to clarify the extent of limitations to enhancement opportunities. These should relate to adverse effects from consented activities and be within the same sub-catchment or Freshwater Management Unit.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Ngati Haua Iwi Trust	PC1-11844	Policy 17	RETAIN Policy 17.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Submitter ID: 73515					FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6562	Policy 17	AMEND Policy 17 so that Considering the wider context of the Vision and Strategy applies only to diffuse discharges.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants. One of FFNZ's fundamental principles is consistency in approach between point source and diffuse discharges; urban and rural. FFNZ considers that this is achieved through point source discharges adopting BPO and diffuse discharges adopting MPA. Accordingly FFNZ opposes the amendments sought tso that PPC1 and Variation 1 only apply to diffuse discharge.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10603	Policy 17	RETAIN Policy 17.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Ravensdown Limited Submitter ID: 74058	PC1-10123	Policy 17	RETAIN the intent of Policy 17 as it is currently written.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
South Waikato District Council Submitter ID: 72892	PC1-4101	Policy 17	AMEND Policy 17 to ensure the intention and scope of the policy is clear.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Stark, Steven and Theresa Submitter ID: 73721	PC1-5148	Policy 17	DELETE Policy 17 in its entirety.	Support	FFNZ agrees that Policy 17 ought to be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Taupo District Council Submitter ID: 74207	PC1-8118	Policy 17	RETAIN Policy 17.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11793	Policy 17	RETAIN Policy 17.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10365	Policy 17	RETAIN Policy 17.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought	Support or oppose	Reasons
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3406	Policy 17	RETAIN Policy 17.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Waikato Federated Farmers Meat & Fibre Industry Group Submitter ID: 73934	PC1-2707	Policy 17	DELETE Policy 17.	Support	FFNZ agrees that Policy 17 ought to be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because FFNZ considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Waikato Regional Council Submitter ID: 72890	PC1-3099	Policy 17	RETAIN Policy 17.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11356	Policy 17	RETAIN Policy 17 as notified or amended by similar wording to like effect.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2124	Policy 17	RETAIN Policy 17.	Oppose	FFNZ opposes Policy 17 and seeks that it be deleted. FFNZ opposes Policy 17 as set out in FFNZ's submissions on Variation 1, amongst others, because it considers that the matters addressed in Policy 17 like biodiversity are inappropriate for a plan change that should focus on water quality and contaminants.



Federated Farmers of New Zealand

Further submission on Proposed Waikato Regional Plan Change 1 and Variation 1 Waikato and Waipa River Catchments

17 September 2018



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**FURTHER SUBMISSION TO WAIKATO REGIONAL COUNCIL ON PROPOSED WAIKATO
REGIONAL PLAN CHANGE 1 AND VARIATION 1 WAIKATO AND WAIPA RIVER
CATCHMENTS**

Form 6

Further submission in support of, or in opposition to, submission on notified proposed plan change
and plan variation

Clause 8 of Schedule 1, Resource Management Act 1991

To: The Chief Executive
 Waikato Regional Council
 Private Bag 3038
 Waikato Mail Centre
 Hamilton 3240

Name of submitter: Federated Farmers of New Zealand Inc (“**FFNZ**”)

Contact person: Nikki Edwards
 Senior Policy Advisor

Address for service: nedwards@fedfarm.org.nz
 PO Box 447, Hamilton 3240

This is a further submission in support of or in opposition to a submission on a change and variation to Proposed Waikato Regional Plan Change 1 (“**PC 1**”) and Variation 1 (“**Variation 1**”) Waikato and Waipa River Catchments.

1. FFNZ is a person representing a relevant aspect of public interest, including for the reasons set out under headings 1 and 2 on the following pages.
2. FFNZ is a person who has an interest in the proposal that is greater than the interest the general public has, including for the reasons set out in headings 1 and 2 in the following pages.
3. FFNZ could not gain an advantage in trade competition through this further submission.
4. FFNZ wishes to be heard in support of its submissions and further submission.

Due to the size of FFNZ’s further submissions, this document has been separated into four volumes. In each volume, the first three sections are repeated. Section 4 (the specific comments) are different in each volume as follows:

- a. Volume 1 – Objectives
- b. Volume 2 – Policies

- c. Volume 3 – Methods and Rules
- d. Volume 4 – Schedules, Glossary of Terms and consequential amendments

1. INTRODUCTION

- 1.1 FFNZ welcomes the opportunity to provide further submissions on Plan Change 1 and Variation 1.
- 1.2 As identified in its primary submissions, FFNZ represents a variety of dairy, dry stock, arable crops and horticulture land users in the Waikato region. FFNZ is a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses. FFNZ is a pan sector organisation that works with farmers to ensure practical and workable outcomes.
- 1.3 FFNZ aims to add value to its members' farming businesses. Its key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
 - a. FFNZ's members may operate their business in a fair and flexible commercial environment;
 - b. FFNZ's members, their families and their staff have access to services essential to the needs of the rural community; and
 - c. FFNZ's members adopt responsible management and environmental practices
- 1.4 FFNZ represents members who are engaged in a wide range of land use activities in the Waikato and Waipa River Catchment. This includes dairy farms, a range of drystock activities (including sheep and beef for meat and wool, cattle grazing for dairy support and deer for meat and velvet), horticulture activities (from commercial vegetable growing to cropping to orchards), a mixture of dairy, dry stock and horticulture and intensive farming activities like pig farming.
- 1.5 Both in the lead up to and following FFNZ's submissions on Plan Change 1 and Variation 1, FFNZ has undertaken extensive consultation with its members. This has included public meetings, member advisories, newspaper articles, discussion groups, one on one meetings, meetings with stakeholders, and projects with individual farmers to understand the implications of Plan Change 1 and Variation 1.
- 1.6 FFNZ has also undertaken extensive consultation with a range of farming and community interest groups, as well as territorial authorities and businesses that rely on the rural economy. As the largest pan sector organisation representing farming interests, FFNZ has attempted to find a middle ground position that attempts to balance the competing interests.

2. IMPORTANCE OF FARMING AND HORTICULTURE

- 2.1 Farming, horticulture and primary production activities are important for the social, economic and cultural wellbeing of people and communities in the Waikato region.
- 2.2 The economic importance of the agriculture sector to New Zealand's economy is well recognised. Its direct and indirect contribution to New Zealand's economy is about 15%.
- 2.3 As a broad indicator, Infometrics 2012 identified the agriculture, forestry and fishing industry as contributing the greatest proportion of the Waikato region's GDP (15.9%) and employing 22,090 followed closely by manufacturing (15.6%) which is estimated to have employed 20,513 in 2012. Notably, the Waikato region accounts for about a third of New Zealand's dairy production. Any regional plan provision which affects farm and horticulture business has the potential to also impact, positively or negatively, on regional and national economies.
- 2.4 Agriculture does not just bring economic benefits to the district, it also contributes to the wellbeing of communities and culture of the district. Farming is the fabric that keeps rural communities together.
- 2.5 Farming is such a large part of New Zealand's culture that a lot of depictions of the 'typical' New Zealander involve farming. For example, we are proud of their 'number 8 wire' mentality – referring to a type of fencing wire used on farms that we will use to solve any problem.

3. GENERAL COMMENTS

- 3.1 The further submission process has been an opportunity for parties to understand each other's position and to provide clarity as to their own position. FFNZ has taken the opportunity to understand the submissions of all parties and has attempted to clarify its position. FFNZ has focused primarily on submissions on Plan Change 1 because it provided a comprehensive and detailed submission on Variation 1 and the majority of submissions on Variation 1 were to either largely confirm relief sought on Plan Change 1 or to propose amendments that were similar to many of the amendments FFNZ proposed in its submission on Variation 1.
- 3.2 FFNZ observes that there is overwhelming opposition to Plan Change 1 with the majority of submitters expressing concerns about the implications for economic, social and cultural wellbeing. There are a range of options proposed for how Plan Change 1 ought to be amended to address these but the key theme appears to be flexibility and the ability to increase nitrogen (and potentially other contaminants), in appropriate circumstances.
- 3.3 The key alternatives proposed by other parties appear to be:
 - a. Adopting an approach based on land use capability ("LUC"), natural capital, land use suitability ("LUS") and/or some other measure of productivity or soil capability.
 - b. Adopting Best Practicable Option ("BPO") for diffuse discharges. Some submitters have proposed that this is on the basis of input controls.

- c. Providing greater flexibility for low nitrogen discharges to increase e.g. allow them to increase up to 20kgN.
 - d. Establishing catchment collectives and allocating nitrogen and other contaminants to them to manage among their members.
 - e. Deleting the Nitrogen Reference Point (“NRP”) and 75th percentile and/or determining the 75th percentile based on sub-catchments or some scale other than the Freshwater Management Units (“FMU”).
 - f. Amending the stock exclusion rules (e.g. to base them on slope, stock units or break feeding) or removing them and considering through tailored actions in Farm Environment Plans (“FEPs”).
- 3.4 FFNZ’s position in respect of these, and all proposals made in the submissions (as articulated in the summary of submissions), is set out in the tables contained in section 4 of this further submission. In summary, FFNZ opposes most of these proposals and considers that the framework proposed in its submission on Variation 1 (through track changes to PC1), and as described on pages 14 to 18 of its submission on Variation 1, is a more appropriate framework that will more reasonably achieve sustainable management.
- 3.5 While there are some similarities between parts of many other submitter’s proposals and FFNZ’s proposal, FFNZ considers that its proposed framework deals with the concerns in a more robust and comprehensive way that seeks to provide for all sectors. Importantly, FFNZ considers that its proposal addresses economic, social and cultural wellbeing in a way that is consistent.
- 3.6 As explained in FFNZ’s submission on Variation 1 (pages 10 to 13), FFNZ has attempted to create a policy and rule framework that is effects based, equitable and consistent (noting that this does not require the “same” outcome but it does require a similar approach). This has included consistency in approach between lakes and rivers; urban and rural, point source and diffuse discharges; effects based not ownership approach; consistency in approach across all farming activities and all contaminants.
- 3.7 There are a limited number of submitters who have proposed amendments to make the timeframes in Plan Change 1 shorter or to make targets more stringent or to make greater progress towards the 80 year targets in a shorter timeframe. FFNZ’s key concern is that these submitters do not appear to have considered the economic, social and cultural costs nor have they considered what is technically feasible on the basis of available technology. FFNZ strongly opposes proposals to make Plan Change 1 more stringent.
- 3.8 In most parts of this further submission, FFNZ’s views are contingent on other changes being made as proposed in FFNZ’s submission on Variation 1. In this sense, FFNZ’s submission on Variation 1 needs to be seen as a package and FFNZ’s view on particular provision cannot (and should not) be viewed in isolation.
- 3.9 By way of example, FFNZ’s views on the NRP are contingent on the “package.” As explained in the detailed comments, FFNZ supports the NRP as long as it is not used as

an allocation tool or to benchmark nitrogen. FFNZ supports the NRP being used as a reference point to provide information regarding current discharges. However, FFNZ's view on the NRP needs to be viewed in the context of the various other changes it proposes to the objectives, policies, methods, rules and schedules.

- 3.10 By way of example (this is not an exhaustive list), FFNZ proposes changes to the permitted activity rules such that low nitrogen discharge activities could increase to 15kgN (or some other appropriate permitted baseline) as a permitted activity. FFNZ proposes changes to the policies (such as policy 6) to support applications to increase nitrogen in appropriate circumstances (e.g. Most Practicable Action ("MPA") framework). FFNZ proposes changes to Schedule B to provide for recognition of mitigations outside of Overseer, the use of models other than Overseer and alternatives to standards or missing data.
- 3.11 Finally, there were a very large number of submissions on Plan Change 1 and Variation 1, and the summary of submissions was equally large. This further submission has ended up comprising four very large documents and has taken considerable time to draft. In these circumstances, it is inevitable that there are likely to be some errors or omissions. FFNZ apologises if any comment in this document causes any offence to any party (none is intended). FFNZ welcomes and looks forward to further discussion with Council and the parties prior to the hearing.

4. SPECIFIC COMMENTS

- 4.1 The table on the following pages sets out the particulars of the original submitter and submission number, the provision to which their submission point relates, the relief they seek, whether FFNZ supports or opposes the submission (in whole or in part), and the reasons for FFNZ's position.
- 4.2 In terms of decisions sought, FFNZ seeks that the submission points are allowed to the extent that they are supported in this further submission and that they are disallowed to the extent that they are opposed in this further submission.
- 4.3 FFNZ also seeks any consequential changes necessary to give effect to the relief sought or to address the concerns raised in this further submission.

5. FURTHER SUBMISSION SPECIFICS

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Section 3.11.4: Implementation methods					
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10910	Section 3.11.4	<p>RETAIN, DELETE or AMEND 3.11.4 Methods to ensure they will, individually and collectively, direct how the objectives (as retained or amended by the submission) are to be achieved</p> <p>AND ADD NEW methods to ensure that they will, individually or collectively, be capable of implementing the objectives</p> <p>AND ADD a NEW method to read:</p> <p><u>"3.11.4.x Initiate allocation of diffuse discharges:</u> <u>The Waikato Regional Council will initiate a framework for the allocation of diffuse discharges including reductions in nitrogen load according to specified timeframes for reductions by sub-catchment. The Waikato Regional Council will:</u></p> <p><u>a. Use science-based limits for the total allowable load of a contaminant for sub-catchment which will meet the water quality objectives of the plan;</u></p> <p><u>b. Implement contaminant leaching rates for diffuse discharges from properties and enterprises by allocating to limits, targets and timeframes;</u></p> <p><u>c. Quantify nitrogen load reductions based on over-allocation of nitrogen</u></p>	Oppose	<p>FFNZ does not support the objectives as retained or amended by this submitter's submission.</p> <p>FFNZ does not support a new policy about allocating discharges for reasons including that there is no reliable or equitable basis to allocate discharges, there is no need to allocate (they can be adequately managed without allocation) and allocation is likely to result in significant cost for no net benefit.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>beyond the science-based limit for sub-catchments; and</u> <u>d. Define timeframes for sub-catchment nitrogen load reductions to be made."</u>		
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11494	Section 3.11.4	AMEND 3.11.4 Implementation Methods in accordance with the changes sought to the Objectives, Policies, Methods, Rules and Schedules. AND AMEND PPC1 to include a new Method which provides for Regional Council support of catchment groups and approaches to addressing complex land and water management issues, including sub-catchment specific studies, data collection, catchment group facilitation, development and funding of sub-catchment models which support catchment groups, decision making and consenting.	Support in part Oppose in part	FFNZ opposes this submission point to the extent that it disagrees with changes sought by this submitter to the Objectives, Policies, Methods, Rules and Schedules. FFNZ supports a new method that provides for catchment groups and considers that they have an important role play in addressing complex land and water management issues, including sub-catchment specific studies, data collection, catchment group facilitation, development and funding of sub-catchment models which support catchment groups, decision making and consenting.
DairyNZ Submitter ID: 74050	PC1-10239	Section 3.11.4	ADD a NEW method to read: <u>"Method 3.11.4.13 Research and dissemination of edge of field mitigations that reduce diffuse contaminants/...</u> <u>Waikato Regional Council will research and disseminate a guideline to assist Certified Farm Environment Planners, Waikato Regional Council and landowners choose effective edge of field mitigations that address the risk of discharges from an individual farm context and will</u>	Support in part	FFNZ considers that research and dissemination of edge of field mitigations to assist farm environment planners would be helpful. FFNZ considers that mitigations should not be focused solely on individual properties and considers that coordinated catchment actions are likely to result in greater water quality improvements. FFNZ considers that this type of approach and/or method ought to apply to all discharges, not just diffuse, and sources of contaminants, not just manmade e.g. pest fish etc.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>reduce the diffuse discharge of nitrogen, phosphorus, sediment and microbial contaminants, by:</u></p> <p><u>a. Evaluating existing general guidelines</u></p> <p><u>b. Involving technical experts in soil conservation, riparian and wetland management, nutrient management and Overseer from council, industry and research organisations in the development of solutions</u></p> <p><u>c. Develop a schedule that is linked to Rule 3.11.5.4 that describes acceptable mitigations such as constructed or natural wetlands that are not accounted for currently in Overseer.</u></p> <p><u>d. Setting up processes to facilitate mutual understanding between landowners and technical experts."</u></p>		
Department of Conservation Submitter ID: 71759	PC1-10633	Section 3.11.4	<p>ADD NEW Methods to achieve the new proposed objective [see submission point PC1-10521].</p> <p>AND ADD a NEW Method which prioritises the capture of key information to inform the management of lakes with little or no recent water quality information e.g Te Otamanui Lagoon, Lake Rotongaroti, Lake Rotongaro, Lake Rotokaraka, Lake Hotoananga, Lake Pikopiko, Lake Komakoru, Lake Rotokaeo, Lake Opuatia.</p> <p>AND ADD a NEW method to prioritise further research on nutrient and</p>	Oppose in part	<p>FFNZ does not support the proposed objective and therefore does not support a method to achieve it.</p> <p>In principle, FFNZ supports gathering information and better understanding the lakes.</p> <p>In principle, FFNZ supports the prioritisation of further research on nutrient and sediment attenuation tools for use in lake catchments.</p> <p>FFNZ does not support regulatory methods for private land in lake catchments. FFNZ is concerns include that this will likely result in significant cost for no net benefit and public funding ought to be provided for public benefit and/or land owners</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>sediment attenuation tools for use in lake catchments.</p> <p>AND ADD regulatory methods for private land in lake catchments where protection works on public land adjoining lakes has been completed, where the regulatory methods require fencing around waterbodies and the planting of vegetative buffers, together with compulsory implementation of farm management plans.</p> <p>AND ADD a NEW Method or Methods into PPC1 to actively reflect current best practice in relation to the protection of peat lakes. At a minimum the method or methods should focus on maintaining ground water levels over the summer periods, creating good buffer zones, and reducing cultivation on peat solids or establishing large setbacks from cultivation to reduce the effects of peat shrinkage on the lake ecosystem.</p> <p>AND ADD a NEW Method to ensure that the significant values of all wetlands are not impacted by elevated levels of nutrient and sediment by supporting:</p> <ul style="list-style-type: none"> • fencing setbacks of 10m for all wetlands, • requirements that Farm Environment Plans identify critical wetland areas, and 		<p>compensated.</p> <p>FFNZ considers it inappropriate and unnecessary to require a method about best practice in relation to peat lakes. FFNZ supports further research and a better understanding of the issues affecting peat lakes but considers the submitter's proposal is likely to result in significant cost for no net benefit.</p> <p>FFNZ opposes a new method to ensure that the significant values of all wetlands are not impacted by elevated levels of nutrient and sediment for reasons including that such an approach is inflexible, likely to result in significant cost for no net benefit and uncertain (e.g. identification of wetlands is likely to be uncertain).</p> <p>FFNZ opposes a new method to achieve the targets the submitter proposes for Whangamarino wetland for reasons including that they are unrealistic and will impose significant cost, any targets ought to be determined through a community process and it is premature when the catchment is not well understood.</p> <p>FFNZ supports a new method regarding gathering information but considers it ought to be as proposed in its submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>identify how elevated nutrients/sediment will be avoided or mitigated,</p> <ul style="list-style-type: none"> • requirements that Farm Environment Plans to identify where existing wetland drainage can be restored to prevent the drying of wetlands, • benchmarking of wetland nutrient and sediment status by 2023, and • establishment of a research programme to determine the attenuation capacity of natural wetlands. <p>AND ADD a NEW method to achieve the targets for the proposed Whangamarino wetland Freshwater Management Unit outlined in Appendix E and F of the submission, that supports:</p> <ul style="list-style-type: none"> • Investment in catchment wide programmes to reduce critical sediment sources • Minimum fencing set-backs of 10 metres for all contributing streams/rivers • Investment in collaborative stakeholder programmes to reduce Lake Waikare bank erosion • development of a mitigation 		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>strategy to address sediment, nitrogen and phosphorus from drains entering natural waterways in the Freshwater Management Unit</p> <ul style="list-style-type: none"> • A review of all consents that relate to the Lower Waikato Flood Control Scheme by 2020, to identify the optimal approach to address water quality <p>AND ADD a NEW Method with the new text from Policy 7 '<u>To ensure this occurs, collect information and undertake research... should take advantage of new data and knowledge</u>' [NOTE that the submitter may have mistakenly requested that all of this be deleted from Policy 7, given that they also asked for Policy 7(b) and (d) to be amended].</p>		
Hamilton, Malibu Submitter ID: 74083	PC1-9867	Section 3.11.4	AMEND PPC1 to ensure that methods are set out once a target is set.	Oppose	FFNZ considers that methods are able to be provided prior to targets and considers that they ought to be non regulatory and as proposed in FFNZ's submission on Variation 1.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9332	Section 3.11.4	<p>ADD a NEW Method to read: <u>"3.11.4.13 Decision support system The Waikato Regional Council working with regional stakeholders will: a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures</u></p>	<p>Support in part</p> <p>Oppose in part</p>	FFNZ supports monitoring and information gathering and other steps to better understand the catchment, the effects of mitigations and the progress towards reasonable targets. However, FFNZ is concerned that the proposed decision support tool is likely to be too detailed (and has concerns about the use of information gathered at a property level and how reliable and accurate this will

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u></p> <p><u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."</u></p>		<p>be) and does not support the use of this information to develop an allocation framework.</p> <p>Therefore, FFNZ prefers an approach that aggregates actions at a suitably high level and considers progress at a sub-catchment scale.</p>
<p>New Zealand Forest Owners Association Inc Submitter ID: 73524</p>	<p>PC1-9953</p>	<p>Section 3.11.4</p>	<p>AMEND PPC1 Methods (3.11.4) to provide an equitable regulation of diffuse sources of contaminants that requires the internalisation of adverse effects. This should include appropriate rules to control those activities and land uses that are contributing the most contaminants to the Waikato and Waipā rivers and reduce their contaminant loading. AND AMEND to ensure that land use is not 'frozen', even on an interim basis AND AMEND to provide that if an allocation regime is to be adopted in future it should be based on a consistent foundation (such as Land Use Capability) treating all land consistently.</p>	<p>Oppose in part</p>	<p>FFNZ supports the equitable regulation of diffuse discharges (and considers that this ought to apply to point source as well). However, it has concerns about a requirement to internalise adverse effects because for many properties this is unlikely to be an option., likely to impose significant cost and unlikely to be necessary to effectively manage water quality.</p> <p>FFNZ is also concerned that such an approach is likely to result in allocation of contaminants and FFNZ does not support allocation.</p> <p>FFNZ agrees that flexibility ought to be provided for land use change.</p> <p>FFNZ does not support allocation for reasons including that there is no equitable and reliable basis to allocate contaminants and it does not support allocation on the basis of LUC for reasons</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					including that LUC is not a proxy for nitrogen, nitrogen can be effectively managed without allocation and allocation is likely to result in significant cost for no net environmental benefit.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11857	Section 3.11.4	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system The Waikato Regional Council working with regional stakeholders will:</u> <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."</u>	Support in part Oppose in part	FFNZ supports monitoring and information gathering and other steps to better understand the catchment, the effects of mitigations and the progress towards reasonable targets. However, FFNZ is concerned that the proposed decision support tool is likely to be too detailed (and has concerns about the use of information gathered at a property level and how reliable and accurate this will be) and does not support the use of this information to develop an allocation framework. Therefore, FFNZ prefers an approach that aggregates actions at a suitably high level and considers progress at a sub-catchment scale.
Oil Companies Submitter ID: 73716	PC1-2973	Section 3.11.4	RETAIN Rules 3.11.5.1 - 3.11.5.7 without any modification	Oppose in part	FFNZ considers that the methods ought to be amended as set out in FFNZ's submission on Variation 1 and refers to the reasons in that submission.
Oji Fibre Solutions (NZ) Limited Submitter ID:	PC1-6563	Section 3.11.4	AMEND 3.11.4 Implementation Methods to ensure that the provisions of PPC1 or alternatively, the	Oppose in part	FFNZ does not support the BPO approach proposed by this submitter because it is on the basis of input controls and FFNZ considers that it

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
73725			alternative approach proposed in the submission, are capable of implementation. AND AMEND Policy 7 by redrafting it as a NEW Method, with amendments to clarify that future allocation will not be grandparented or based on existing use OR ADD a new policy/method drafted to adopt the alternative approach proposed in the submission and to provide the basis for collection of information and further research.		ought to be on the basis of the MPA framework for FEPs that FFNZ proposes in its submission on Variation 1. Therefore, FFNZ supports the amendment of methods to reflect its submission on Variation 1 and not the submitter's proposal for BPO. FFNZ does not support Policy 7 on the basis it is premature to allocate nitrogen and does not support the adoption of it as a method. FFNZ considers that there should be no allocation on grandparenting, LUC, LUS or any other method. FFNZ supports the collection of information, research and gaining a better understanding of the catchment, water quality issues and effects of mitigations but does not support this being used to support or justify an allocation approach.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10582	Section 3.11.4	ADD a NEW Method to read: <u>"3.11.4.13 Decision support system The Waikato Regional Council working with regional stakeholders will: a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan. For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) -</u>	Support in part Oppose in part	FFNZ supports monitoring and information gathering and other steps to better understand the catchment, the effects of mitigations and the progress towards reasonable targets. However, FFNZ is concerned that the proposed decision support tool is likely to be too detailed (and has concerns about the use of information gathered at a property level and how reliable and accurate this will be) and does not support the use of this information to develop an allocation framework. Therefore, FFNZ prefers an approach that aggregates actions at a suitably high level and considers progress at a sub-catchment scale.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."		
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11806	Section 3.11.4	ADD a NEW Method to read: "3.11.4.13 Decision support system The Waikato Regional Council working with regional stakeholders will: a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan. For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."	Support in part Oppose in part	FFNZ supports monitoring and information gathering and other steps to better understand the catchment, the effects of mitigations and the progress towards reasonable targets. However, FFNZ is concerned that the proposed decision support tool is likely to be too detailed (and has concerns about the use of information gathered at a property level and how reliable and accurate this will be) and does not support the use of this information to develop an allocation framework. Therefore, FFNZ prefers an approach that aggregates actions at a suitably high level and considers progress at a sub-catchment scale.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10466	Section 3.11.4	ADD a NEW Method to read: "3.11.4.13 Decision support system The Waikato Regional Council working with regional stakeholders	Support in part Oppose in	FFNZ supports monitoring and information gathering and other steps to better understand the catchment, the effects of mitigations and the progress towards reasonable targets. However,

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>will:</u> <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."</u></p>	part	<p>FFNZ is concerned that the proposed decision support tool is likely to be too detailed (and has concerns about the use of information gathered at a property level and how reliable and accurate this will be) and does not support the use of this information to develop an allocation framework.</p> <p>Therefore, FFNZ prefers an approach that aggregates actions at a suitably high level and considers progress at a sub-catchment scale.</p>
van der Voorden, Vera and Nora Submitter ID: 74109	PC1-11279	Section 3.11.4	<p>AMEND PPC1 to ensure that methods are set out once a target is set AND AMEND PPC1 to ensure Waikato Regional Council develops a freshwater implementation and programme of change plan which includes the aforementioned elements.</p>	Oppose in part	<p>FFNZ considers that methods are able to be provided prior to targets and considers that they ought to be non regulatory and as proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that WRC ought to adopt a freshwater implementation plan but does not agree it ought to include the elements proposed by the submitter.</p>
Volker, Peter Submitter ID: 73690	PC1-10289	Section 3.11.4	<p>AMEND PPC1 by providing clear direction on how the PPC1 Permitted Activities will be monitored and reviewed, and about what penalties will be imposed for breaches. AMEND PPC1 to detail policies</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports guidance on how permitted activities will be monitored and enforced but considers the guidance required is much broader and includes matters such as how consents will be considered/assessed, how FEPs will be reviewed, how obligations in FEPs will be monitored and</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			(3.11.3) and methods (3.11.4) for managing to the set targets, including responsibilities for meeting the target and how the policy will affect land users and others discharging contaminants, and how rules and resource consents will be adjusted.		compliance assessed etc. FFNZ does not support allocation or the 80 year targets. It is concerned that adopting details around this as proposed by the submitter will result in significant unnecessary cost and inflexibility and other issues. Therefore it opposes the proposal.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3519	Section 3.11.4	ADD a NEW Method to read: <u>"3.11.4.13 Decision support system The Waikato Regional Council working with regional stakeholders will:</u> <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."</u>	Support in part Oppose in part	FFNZ supports monitoring and information gathering and other steps to better understand the catchment, the effects of mitigations and the progress towards reasonable targets. However, FFNZ is concerned that the proposed decision support tool is likely to be too detailed (and has concerns about the use of information gathered at a property level and how reliable and accurate this will be) and does not support the use of this information to develop an allocation framework. Therefore, FFNZ prefers an approach that aggregates actions at a suitably high level and considers progress at a sub-catchment scale.
Waikato Regional Council Submitter ID: 72890	PC1-3101	Section 3.11.4	AMEND 3.11.4 the provisions related to nitrogen management so that the methods can be implemented. AND AMEND the provisions related	Support in part Oppose in	FFNZ considers that the methods may need amendment to address nitrogen management but it does not support the use of the NRP as a tool to grandparent nitrogen or the use of Overseer as the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			to commercial vegetable production so that the methods can be implemented.	part	basis to enforce a NRP. FFNZ considers that the commercial vegetable growing rules need to be amended to provide for the nature of the activity e.g. crop rotation. However, it considers that this is better addressed through the amendments FFNZ proposes in its submission on Variation 1.
Buckley, Peter Ross Submitter ID: 71423	PC1-1416	Method 3.11.4.1	RETAIN Method 3.11.4.1.	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
Cameron, Bruce Submitter ID: 60603	PC1-6376	Method 3.11.4.1	RETAIN Method 3.11.4.1. AND AMEND to include reference to efficiency and costs.	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community. FFNZ agrees that this method could be amended to refer to efficiency and cost.
Department of Conservation Submitter ID: 71759	PC1-10750	Method 3.11.4.1	RETAIN Method 3.11.4.1 as notified.	Support in part	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9803	Method 3.11.4.1	RETAIN Method 3.11.4.1.	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
Genesis Energy Limited	PC1-8808	Method 3.11.4.1	RETAIN Method 3.11.4.1	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74052					collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	Method 3 PC1-10089	Method 3.11.4.1	RETAIN Method 3.11.4.1.	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-10008	Method 3.11.4.1	RETAIN Method 3.11.4.1 AND include Lumbercorp NZ Ltd in any working group or consultative group that is set up, particularly regarding the Waikare sub-catchment and development of a Waikare sub-catchment management plan.	Support in part	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community. FFNZ considers that all stakeholders (not just Lumbercorp) ought to be included in any working group or consultative group.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9311	Method 3.11.4.1	AMEND Method 3.11.4.1 to read: " <u>Working with others Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."	Oppose	FFNZ considers that Method 1 ought to include all stakeholders not just iwi partners or "regional" stakeholders.
Matamata-Piako District Council Submitter ID: 73419	PC1-3516	Method 3.11.4.1	RETAIN Method 3.11.4.1.	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
Mercury NZ Limited Submitter ID: 73182	PC1-9584	Method 3.11.4.1	RETAIN Method 3.11.4.1.	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.

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Miraka Limited Submitter ID: 73492	PC1-8843	Method 3.11.4.1	RETAIN Method 3.11.4.1.	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4624	Method 3.11.4.1	RETAIN Method 3.11.4.1.	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
New Zealand Steel Ltd Submitter ID: 73790	PC1-3728	Method 3.11.4.1	RETAIN Section 3.11.4.1.	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11845	Method 3.11.4.1	AMEND Method 3.11.4.1 to read: "Working with others <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."	Oppose	FFNZ considers that Method 1 ought to include all stakeholders not just iwi partners or "regional" stakeholders.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10604	Method 3.11.4.1	AMEND Method 3.11.4.1 to read: "Working with others <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."	Oppose	FFNZ considers that Method 1 ought to include all stakeholders not just iwi partners or "regional" stakeholders.
Ravensdown Limited Submitter ID: 74058	PC1-10124	Method 3.11.4.1	RETAIN the intent of Method 3.11.4.1 as it is currently written.	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
South Waikato District Council Submitter ID: 72892	PC1-4103	Method 3.11.4.1	RETAIN Method 3.11.4.1.	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
Taupo District Council Submitter ID: 74207	PC1-8120	Method 3.11.4.1	RETAIN Method 3.11.4.1.	Support	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11794	Method 3.11.4.1	AMEND Method 3.11.4.1 to read: "Working with others <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."	Oppose	FFNZ considers that Method 1 ought to include all stakeholders not just iwi partners or "regional" stakeholders.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8386	Method 3.11.4.1	RETAIN Method 3.11.4.1.	Support in part	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10366	Method 3.11.4.1	AMEND Method 3.11.4.1 to read: "Working with others <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."	Oppose	FFNZ considers that Method 1 ought to include all stakeholders not just iwi partners or "regional" stakeholders.
Waikato and Waipā River Iwi Submitter ID:	PC1-3407	Method 3.11.4.1	AMEND Method 3.11.4.1 to read: "Working with others <u>Waikato and Waipā River Iwi partners and</u>	Oppose	FFNZ considers that Method 1 ought to include all stakeholders not just iwi partners or "regional" stakeholders.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
74035			<u>Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."		
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11357	Method 3.11.4.1	RETAIN Method 3.11.4.1 as notified or amended by similar wording to like effect.	Support in part	FFNZ agrees that Method 1 ought to be retained for reasons including that FFNZ supports a collaborative approach and considers that the best outcomes can only be achieved by working with stakeholders and the community.
AFFCO New Zealand Limited Submitter ID: 74140	PC1-7687	Method 3.11.4.2	AMEND Method 3.11.4.2 and all other places in PPC1 to change " Certified Industry Scheme " to " <u>Certified Sector Scheme</u> ".	Support in part	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. If the scheme or proposal could have a more appropriate title or name, FFNZ would support that. FFNZ considers that using the word "sector" may be helpful to suggest that the scope is wider than just "industry" but is not sure that "sector" is the right word e.g. the schemes may include several farming sectors and may not be set up on a sector by sector basis (and it may be appropriate to provide flexibility for such an approach).
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6152	Method 3.11.4.2	Method 3.11.4.2: AMEND to provide further and better particulars regarding the process and timing for the establishment of Certified Industry Schemes, including a commitment that these will be listed/available on the Waikato Regional Council website by 22 October 2017 AND AMEND provide further and better particulars regarding criteria for	Support in part	FFNZ supports more information about the CIS, including amendments to schedule 2 as set out in FFNZ's submission on Variation 1. FFNZ also supports providing more information about how the schemes will be certified and monitored and also the role of the CIS.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			certifying industry schemes. [Refer to relief sought for Rule 3.11.5.3 and Rule 3.11.5.4]		
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10911	Method 3.11.4.2	DELETE Method 3.11.4.2.	Oppose	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore, it considers the method should not be deleted.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11495	Method 3.11.4.2	AMEND Method 3.11.4.2 and associated Schedules, Policies and Rules to expand criteria for certified industry schemes, auditing and reporting processes.	Support in part	FFNZ supports more information about the CIS, including amendments to schedule 2 as set out in FFNZ's submission on Variation 1. FFNZ also supports providing more information about how the schemes will be certified, audited and/or monitored and also the role of the CIS.
Buckley, Peter Ross Submitter ID: 71423	PC1-1417	Method 3.11.4.2	RETAIN Method 3.11.4.2.	Support	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.
Cameron, Bruce Submitter ID: 60603	PC1-6377	Method 3.11.4.2	RETAIN Method 3.11.4.2.	Support	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.
Charion Investment Trust Submitter ID: 71344	PC1-7762	Method 3.11.4.2	AMEND Method 3.11.4.2 to include a provision to allow the adoption of Farm Environment Plans that meet the criteria for information required by the Council without being prepared or monitored by a 'Certified'	Oppose in part	FFNZ supports the preparation of FEPs by a certified farm environment planner if this means that Council has control over the planner but not over content of the FEP. FFNZ considers that this is appropriate because Council is not in the business of farming and refers further to the reasons set out

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>professional. AND AMEND the rules to ensure the following conditions apply to a controlled activity (after 1 July 2020) -</p> <p><u>"1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</u> <u>2. A Nitrogen Reference Point is calculated for the property or enterprise in conformance with Schedule B and was provided to the Waikato Regional Council within the period 1 September 2018 to 31 March 2019; and</u> <u>3. The five year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; and</u> <u>4. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C."</u> AND REMOVE the reference to priority catchments and associated dates from the Matters of Control in the rules.</p>		<p>in its submission on Variation 1.</p> <p>In principle, FFNZ does not have an issue with the proposed conditions for controlled activities and supports removing control over FEPs. However, it considers that further amendments are required as set out in FFNZ's submission on Variation 1.</p>
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10786	Method 3.11.4.2	AMEND Method 3.11.4.2 to read: "3.11.4.2 Certified Industry Scheme... ...Agreements will include: c. Information <u>provision sharing</u> d. Aggregate Collective reporting on Certified Industry Scheme	Support in part	In principle, FFNZ does not have an issue with the changes in terminology e.g. "provision" and "collective" provided that the intent is the same and that confidentiality and privacy of data is maintained.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			implementation; e. <u>Process for dealing with non-compliance by the Certified Industry Scheme;</u> f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme; and...</u> "		FFNZ agrees that a process for compliance by the CIS would be helpful as would a process for non compliance by members. That would help to provide clarity around the role of the CIS and help farmers to assess whether to rely on the CIS permitted activity rule or the controlled activity rule.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9830	Method 3.11.4.2	AMEND Method 3.11.4.2 to read: "Waikato Regional Council will develop an <u>work collaboratively with industry to ensure an agreed certification process is applied for industry bodies</u> as per the standards outlined in Schedule 2."	Support in part	FFNZ supports WRC working with industry to develop the CIS provided that the process is robust and is not captured by a particular interest group and addresses the matters set out in FFNZ's submission in Variation 1 (including changes to Schedule 2).
Fletcher Trust Submitter ID: 73848	PC1-5997	Method 3.11.4.2	ADD a provision for discretion to allow Farm Environment Plans to be prepared by someone other than a Certified Farm Environment Planner. AND AMEND rules to ensure the following conditions apply to a controlled activity (after 1 July 2020): "1. <u>The property is registered with the Waikato Regional Council in conformance with Schedule A; and</u> <u>2. A Nitrogen Reference Point is calculated for the property or enterprise in conformance with Schedule B and was provided to the Waikato Regional Council within the period 1 September 2018 to 31 March 2019; and</u> <u>3. The five year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which</u>	Oppose in part	FFNZ supports the preparation of FEPs by a certified farm environment planner if this means that Council has control over the planner but not over content of the FEP. FFNZ considers that this is appropriate because Council is not in the business of farming and refers further to the reasons set out in its submission on Variation 1. In principle, FFNZ does not have an issue with the proposed conditions for controlled activities and supports removing control over FEPs. However, it considers that further amendments are required as set out in FFNZ's submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>the Nitrogen Reference Point is provided to the Waikato Regional Council; and</u> <u>4. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C."</u> AND AMEND to remove reference to priority catchments and associated dates from Matters of Control.</p>		
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5723	Method 3.11.4.2	AMEND Method 3.11.4.2 by using a more certain process for a Certified Industry Scheme such as operating under a resource consent process.	Oppose in part	If the submitter means that the CIS obtains a resource consent from WRC, FFNZ's concern is that this may lead to allocation of contaminants to groups and FFNZ opposes such an approach. However, if the intention is to instead provide for a robust certification and auditing approach FFNZ considers that the proposal could have merit but may be better dealt with by amendments to PC1 (e.g. Schedule 2) as opposed to a consenting regime.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10090	Method 3.11.4.2	RETAIN Method 3.11.4.2.	Support	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9313	Method 3.11.4.2	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provisions</u> sharing; d. <u>Aggregate/Collective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme;</u>	Support in part	<p>In principle, FFNZ does not have an issue with the changes in terminology e.g. "provision" and "collective" provided that the intent is the same and that confidentiality and privacy of data is maintained.</p> <p>FFNZ agrees that a process for compliance by the CIS would be helpful as would a process for non-compliance by members. That would help to provide clarity around the role of the CIS and help</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme; and e.g. Consistency across the various Certified Industry Schemes.</u> "		farmers to assess whether to rely on the CIS permitted activity rule or the controlled activity rule.
Mercury NZ Limited Submitter ID: 73182	PC1-9586	Method 3.11.4.2	AMEND 3.11.4.2 to read: "3.11.4.2 Certified Industry <u>Sector</u> Scheme Waikato Regional Council will develop an industry <u>a sector</u> certification process for sector <u>industry</u> bodies as per the standards outlined in Schedule 2. The Certified Industry <u>Sector</u> Scheme will include formal agreements between parties. Agreements will include: a. Provision for management of the Certified Industry <u>Sector</u> Schemes; b. Oversight, and monitoring of Farm Environment Plans; c. Information sharing; d. Aggregate reporting on Certified Industry <u>Sector</u> Scheme implementation; and e. Consistency across the various Certified industry <u>Sector</u> Schemes."	Support in part	In principle, FFNZ supports the CIS as a alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. If the scheme or proposal could have a more appropriate title or name, FFNZ would support that. FFNZ considers that using the word "sector" may be helpful to suggest that the scope is wider than just "industry" but is not sure that "sector" is the right word e.g. the schemes may include several farming sectors and may no be set up on a sector by sector basis (and it may be appropriate to provide flexibility for such an approach).
Miraka Limited Submitter ID: 73492	PC1-8848	Method 3.11.4.2	RETAIN Method 3.11.4.2.	Support	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.
New Zealand Pork Industry Board Submitter ID:	PC1-4626	Method 3.11.4.2	RETAIN Method 3.11.4.2.	Support	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
73780					Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11846	Method 3.11.4.2	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provisions</u> sharing; d. <u>Aggregate</u> <u>Collective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme;</u> f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme;</u> and e.g. Consistency across the various Certified Industry Schemes."	Support in part	In principle, FFNZ does not have an issue with the changes in terminology e.g. "provision" and "collective" provided that the intent is the same and that confidentiality and privacy of data is maintained. FFNZ agrees that a process for compliance by the CIS would be helpful as would a process for non compliance by members. That would help to provide clarity around the role of the CIS and help farmers to assess whether to rely on the CIS permitted activity rule or the controlled activity rule.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6564	Method 3.11.4.2	AMEND Method 3.11.4.2 so that it is consistent with the alternative approach proposed in the submission and include the requirement for a resource consent to establish the Certified Industry Scheme AND AMEND by limiting the use of a Certified Industry Schemes to the implementation of specified minimum standards defined as the Best Practicable Options for the activities AND AMEND so that those administering OVERSEER hold appropriate qualifications including the requirement for a Certificate of Completion in Sustainable Nutrient	Oppose	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore it opposes the deletion of the CIS from PC1. In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Management in New Zealand and a Certificate of Completion in Advanced Sustainable Nutrient Management from Massey University. [Refer to the relief sought Schedule B and the alternative approach proposed in the submission, including in relation to the application of the Overseer Model]		Therefore, FFNZ opposes limiting the CIS to BPO. FFNZ agrees that those administering Overseer need to hold appropriate qualifications but this applies to a certified farm environment planner and can be addressed through the certification process as opposed to CIS (as under the CIS or controlled activity the certified farm environment planners are likely to be the same people).
Raukawa Charitable Trust Submitter ID: 74073	PC1-10560	Method 3.11.4.2	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provisions sharing</u> ; d. <u>Aggregate/Collective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme</u> ; f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme</u> ; and e.g. Consistency across the various Certified Industry Schemes."	Support in part	In principle, FFNZ does not have an issue with the changes in terminology e.g. "provision" and "collective" provided that the intent is the same and that confidentiality and privacy of data is maintained. FFNZ agrees that a process for compliance by the CIS would be helpful as would a process for non-compliance by members. That would help to provide clarity around the role of the CIS and help farmers to assess whether to rely on the CIS permitted activity rule or the controlled activity rule.
Ravensdown Limited Submitter ID: 74058	PC1-10125	Method 3.11.4.2	AMEND Method 3.11.4.2 as follows: " <u>Certified Certification of Industry Schemes</u> Waikato Regional Council will develop an <u>work collaboratively with industry to ensure an agreed</u> certification process <u>is applied for industry bodies</u> as per the standards outlined in Schedule 2. The Certified Industry Scheme will include formal agreements between parties.	Support in part	FFNZ supports WRC working with industry to develop the CIS provided that the process is robust and is not captured by a particular interest group and addresses the matters set out in FFNZ's submission in Variation 1 (including changes to Schedule 2).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Agreements will include:" AND ADOPT the definitions sought in this submission relating to certification programmes.		
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11115	Method 3.11.4.2	Provide further and better particulars regarding the process and timing for the establishment of Certified Industry Schemes, including a commitment that these will be listed/available on the Waikato Regional Council website by 22 October 2017. AND provide further and better particulars regarding criteria for certifying industry schemes. AND refer to relief sought for Rule 3.11.5.3 and Rule 3.11.5.4.	Support in part	FFNZ supports more information about the CIS, including amendments to schedule 2 as set out in FFNZ's submission on Variation 1. FFNZ also supports providing more information about how the schemes will be certified and monitored and also the role of the CIS.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9340	Method 3.11.4.2	ADD to Method 3.11.4.2 a qualification to the Certified Farm Environment Planner and Certified Farm Nutrient Advisor requirements that allows the operator of an enterprise or property to take the role of the Certified Farm Environment Planner and Certified Farm Nutrient Advisor for that enterprise or property.	Oppose	FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11795	Method 3.11.4.2	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information provisions sharing; d. Aggregate Collective reporting on Certified... e. Process for dealing with non-	Support in part	In principle, FFNZ does not have an issue with the changes in terminology e.g. "provision" and "collective" provided that the intent is the same and that confidentiality and privacy of data is maintained. FFNZ agrees that a process for compliance by the CIS would be helpful as would a process for non

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>compliance by the Certified Industry Scheme;</u> f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme;</u> and e.g. Consistency across the various Certified Industry Schemes."		compliance by members. That would help to provide clarity around the role of the CIS and help farmers to assess whether to rely on the CIS permitted activity rule or the controlled activity rule.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8210	Method 3.11.4.2	DELETE all reference to Certified Industry Schemes from PPC1.	Oppose	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore FFNZ considers the CIS should not be deleted from PC1.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10389	Method 3.11.4.2	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provisions</u> sharing; d. Aggregate <u>Collective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme;</u> f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme;</u> and e.g. Consistency across the various Certified Industry Schemes."	Support in part	In principle, FFNZ does not have an issue with the changes in terminology e.g. "provision" and "collective" provided that the intent is the same and that confidentiality and privacy of data is maintained. FFNZ agrees that a process for compliance by the CIS would be helpful as would a process for non compliance by members. That would help to provide clarity around the role of the CIS and help farmers to assess whether to rely on the CIS permitted activity rule or the controlled activity rule.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3408	Method 3.11.4.2	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provisions</u> sharing; d. Aggregate <u>Collective</u> reporting on	Support in part	In principle, FFNZ does not have an issue with the changes in terminology e.g. "provision" and "collective" provided that the intent is the same and that confidentiality and privacy of data is maintained.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme;</u> f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme;</u> and e.g. Consistency across the various Certified Industry Schemes."		FFNZ agrees that a process for compliance by the CIS would be helpful as would a process for non compliance by members. That would help to provide clarity around the role of the CIS and help farmers to assess whether to rely on the CIS permitted activity rule or the controlled activity rule.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11358	Method 3.11.4.2	DELETE Method 3.11.4.2 and renumber the subsequent methods accordingly.	Oppose	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore FFNZ considers that Method 1 should not be deleted.
Aitken, David John Submitter ID: 71238	PC1-704	Method 3.11.4.3	AMEND Method 3.11.4.3 to ensure that farmers may choose mitigation options not modelled in OVERSEER. AND AMEND to ensure that farmers are enabled to write their own Farm Environment Plans which serve to enhance mitigation through education and support. AND AMEND to ensure that Certified Farm Environment Planners are provided with Code of Conduct training to ensure that information provided by the farmer remains confidential. Alternatively, relevant information can be obtained from NAIT or Statistics NZ.	Support in part Oppose in part	FFNZ agrees that amendments ought to be made to PC1 to provide for recognition of mitigations outside of Overseer but considers that this may be more appropriately addressed by amendments to Schedule B (and refers to FFNZ's submission on Variation 1). Having said this, FFNZ agrees that farmers need to be involved in the preparation of FEPs. FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					would likely be a worse outcome. FFNZ agrees that providing a code of conduct or similar to ensure maintenance of confidentiality or privacy of information could be a reasonable way of addressing farmer concerns of confidentiality and privacy,
Anselmi, Denzil Peter Submitter ID: 72614	PC1-5143	Method 3.11.4.3	AMEND Method 3.11.4.3 to provide for Farm Environment Plans to be prepared by any person, but must be approved by a person with appropriate certification.	Oppose in part	FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome. Having said this, FFNZ agrees that farmers need to be involved in the preparation of FEPs. The proposal that they are simply signed off by a certified person may have merit but FFNZ is concerned that it may not result in reduction in cost to the farmer.
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6156	Method 3.11.4.3	Method 3.11.4.3: AMEND to provide further and better particulars regarding Waikato Regional Council's expectations as to standard and content. [Refer to relief sought regarding farming activity rules]	Support in part	FFNZ agrees that greater clarity regarding FEPs would be helpful and considers that in developing guidance WRC ought to work with all stakeholders.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID:	PC1-10912	Method 3.11.4.3	AMEND Method 3.11.4.3 to read: "... A Farm Environment Plan will be prepared by a certified person as per the requirements outlined in Schedule 1, and will assess the risk	Oppose	FFNZ opposes an obligation to meet targets for reasons including that the 80 year targets are based on flawed assumptions, there is no reliable way of measuring individual property contributions to targets and such an approach is likely to result in

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
74085			of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens and specify actions to reduce those risks in order to bring about reductions in the discharges of those contaminants <u>which ensure that targets and limits for sub-catchments are being met as required by consent documents...."</u>		allocation (which FFNZ opposes for reasons including that there is no reliable or equitable way to allocate).
Balle Bros Group Submitter ID: 67834	PC1-11413	Method 3.11.4.3	AMEND method 3.11.4.3 to provide clarification on slope in paddocks used for commercial vegetable production where topography is variable across paddocks, in relation to the 15 degree threshold AND AMEND to broaden the definition of a Certified Farm Planner to encompass experience as a qualification and to ensure that enough planners area available to meet Farm Environment Plan demand.	Support in part Oppose in part	<p>FFNZ considers that the submitter's concerns are best addressed through the FEP assessment of critical source areas in Schedule 1 as proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that it is not appropriate to develop rigid and blanket rules about things like cultivation setbacks or above slopes and considers that a tailored approach is preferable through the FEP process.</p> <p>FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.</p> <p>Having said that, FFNZ agrees there is likely to be a supply issue with a likely lack of certified planners and considers that this ought to be addressed and provided for.</p>
Barton, Rachel and Jonathan	PC1-3862	Method 3.11.4.3	AMEND Method 3.11.4.3 to provide for Farm Environment Plan	Support in part	FFNZ agrees that flexibility ought to be provided to amend FEPs and considers that this ought to be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 71425			<p>modifications to make it more cost effective over a longer period, AND REMOVE the Nitrogen Reference Point OR AMEND to provide for a national policy on nitrogen to be developed. AND REMOVE the use of the OVERSEER model due to its inaccuracy. AND AMEND stock exclusion provisions to provide for national standards and excess 18 SU to fence all waterways. AND AMEND to ensure Regional Council changes their culture and how they manage the environment, including being more hands on and involved with communities and not at arm's length.</p>	Oppose in part	<p>addressed through Schedule 1 as amended in FFNZ's submission on Variation 1 and also through amendments to relevant policies and other provisions (e.g. Policy 2B proposed by FFNZ).</p> <p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p> <p>FFNZ agrees that a more appropriate basis for assessing stock exclusion is 18 stock units.</p> <p>FFNZ agrees that WRC should be inclusive with the community and establish and maintain a good relationship with the community.</p>
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11496	Method 3.11.4.3	<p>AMEND Method 3.11.4.3 in accordance with changes sought to Schedule 1. AND DELETE OR AMEND the requirement for a Certified Farm Environment Planner. AND AMEND to introduce greater prioritisation of where Farm Environment Plans are required. AND AMEND to provide a greater link to Farm Environment Plan priorities and empowering a sub-catchment approach between Methods 3.11.4.3 and 3.11.4.5.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ Opposes the proposal to change the method in accordance with Schedule 1 of Beef + Lamb's submission because it opposes many of the changes in that schedule.</p> <p>FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					FFNZ agrees that there is a need to prioritise FEPs, actions within FEPs and sub-catchments. FFNZ agrees it would be helpful to link FEP and sub-catchment priorities.
Buckley, Peter Ross Submitter ID: 71423	PC1-1419	Method 3.11.4.3	RETAIN Method 3.11.4.3 a tailored, risk-based Farm Environment Plan AND AMEND to enable experienced land users to be accredited to develop their own Farm Environment Plan based on a template.	Support in part Oppose in part	<p>FFNZ supports tailored, risk based FEPs but considers that they also need to be flexible and based on MPA (and refers to its submission on Variation 1).</p> <p>FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.</p> <p>Having said this, FFNZ agrees that farmers need to be involved in the preparation of FEPs. FFNZ is also concerned that there is likely to be a supply issue with a likely lack of certified planners and considers that this ought to be addressed and provided for.</p>
Cameron, Bruce Submitter ID: 60603	PC1-6378	Method 3.11.4.3	RETAIN Method 3.11.4.3. AND AMEND PPC1 to permit land users with adequate experience and capabilities to be able to work with a Waikato Regional Council run approved industry or scheme and be accredited to develop their own Farm Environment Plan based on a common template. AND AMEND PPC1 to include an auditing process which	Support in part Oppose in part	<p>FFNZ supports tailored, risk based FEPs but considers that they also need to be flexible and based on MPA (and refers to its submission on Variation 1).</p> <p>FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			is independent of the farmer, the Certified Farm Environment Planner and the Waikato Regional Council.		<p>would need to retain control over FEPs and that would likely be a worse outcome.</p> <p>Having said this, FFNZ agrees that farmers need to be involved in the preparation of FEPs. FFNZ is also concerned that there is likely to be a supply issue with a likely lack of certified planners and considers that this ought to be addressed and provided for.</p>
Charion Investment Trust Submitter ID: 71344	PC1-7765	Method 3.11.4.3	<p>AMEND Method 3.11.4.3 to include a provision to allow the adoption of Farm Environment Plans that meet the criteria for information required by the Council without being prepared or monitored by a 'Certified' professional.</p> <p>AND AMEND the Rules to ensure the following conditions apply to a controlled activity (after 1 July 2020) -</p> <p><u>"1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</u> <u>2. A Nitrogen Reference Point is calculated for the property or enterprise in conformance with Schedule B and was provided to the Waikato Regional Council within the period 1 September 2018 to 31 March 2019; and</u> <u>3. The five year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which the Nitrogen Reference Point is</u></p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports tailored, risk based FEPs but considers that they also need to be flexible and based on MPA (and refers to its submission on Variation 1).</p> <p>FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.</p> <p>Having said this, FFNZ agrees that farmers need to be involved in the preparation of FEPs. FFNZ is also concerned that there is likely to be a supply issue with a likely lack of certified planners and considers that this ought to be addressed and provided for.</p> <p>FFNZ supports the prioritisation of sub-catchments but has concerns about the method to identify the priorities and considers the dates ought to be extended.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>provided to the Waikato Regional Council; and</u> <u>4. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C."</u> AND REMOVE from the Rules the reference to priority catchments and associated dates from the Matters of Control in the rules.</p>		
<p>Christian and Anderson, Ashley John and Frances Ann Submitter ID: 73064</p>	PC1-4767	Method 3.11.4.3	<p>DELETE Method 3.11.4.3 requirement for certified personnel to complete Farm Environment Plans and Nitrogen Reference Points. Method 3.11.4.3: AMEND so individuals can complete Farm Environment Plans and Nitrogen Reference Points and be audited by Waikato Regional Council. AND AMEND to add a template that can be used by the landowner/manager to complete a Farm Environment Plan and Nitrogen Reference Point. AND AMEND to provide training for individuals who want to complete their own Farm Environment Plans and derive their own Nitrogen Reference Points.</p>	<p>Support in part Oppose in part</p>	<p>FFNZ opposes deleting Method 3.</p> <p>FFNZ supports tailored, risk based FEPs but considers that they also need to be flexible and based on MPA (and refers to its submission on Variation 1).</p> <p>FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.</p> <p>Having said this, FFNZ agrees that farmers need to be involved in the preparation of FEPs. FFNZ is also concerned that there is likely to be a supply issue with a likely lack of certified planners and considers that this ought to be addressed and provided for.</p>
<p>CNI Iwi Land Management Limited Submitter ID:</p>	PC1-10788	Method 3.11.4.3	<p>AMEND Method 3.11.4.3 to read: "3.11.4.3 Farm Environment Plans Waikato Regional Council will prepare.....will assess the risk of</p>	Oppose	<p>FFNZ considers that a certified farm environment planner should propose the mitigations and not WRC.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
74026			<p>diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens and specify the <u>mitigation actions</u> to reduce those risks in order to bring about reductions in the discharges of those contaminants. Waikato Regional Council will develop guidance for risk assessments, auditing and compiling Farm Environment Plans. Waikato Regional Council will take a risk based approach to monitoring Farm Environment Plans, starting with more <u>a standardised monitoring programme. Less frequent monitoring and then moving to monitoring would be based on risk assessment and the outcome of previous monitoring results. At least 10% of sites would be assessed by this method.</u> <u>Waikato Regional Council will prepare an audit schedule for undertaking Rrobust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring will be required."</u></p>		FFNZ supports reasonable monitoring but is concerned that appropriate flexibility ought to be provided to respond to changing circumstances etc as set out in its submission on Variation 1. FFNZ also considers that a pragmatic approach ought to be adopted and that standardised monitoring will not be suitable, reasonable or cost effective. FFNZ is also concerned that a standardised approach of assessing 10% of sites will also not result in a sensible, practical or affordable outcome.
Craig, Jeffery Submitter ID: 73072	PC1-9807	Method 3.11.4.3	<p>AMEND Method 3.11.4.3 to allow owners to prepare Farm Environment Plans AND AMEND to extend the timeframe for Farm Environment Plans AND AMEND to provide for separate, reliable measures for the discharge of</p>	<p>Oppose in part Support in part</p>	FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>sediment, nitrogen, phosphorous and microbial pathogens AND AMEND to provide for a Council subsidy for Farm Environment Plan costs AND AMEND to clarify penalties and enforcement for not preparing or implementing a Farm Environment Plan AND AMEND to allow Farm Environment Plans for each land use block rather than the whole property where there is mixed use AND AMEND to provide alternatives to the OVERSEER Model AND AMEND to clarify how Farm Environment Plan auditing and contaminant monitoring will occur and how they will be funded.</p>		<p>Having said this, FFNZ agrees that farmers need to be involved in the preparation of FEPs.</p> <p>Having said that, FFNZ agrees there is likely to be a supply issue with a likely lack of certified planners and considers that this ought to be addressed and provided for.</p> <p>FFNZ is also concerned that there is likely to be a supply issue with a likely lack of certified planners and considers that this ought to be addressed and provided for.</p> <p>FFNZ supports extending the timeframes particularly in light of the delay over the past two years. FFNZ considers that clarity about monitoring and enforcement would be helpful but that a pragmatic approach is required.</p> <p>FFNZ supports flexibility to adopt alternatives to Overseer or recognise mitigations outside of Overseer and/or changes to inputs and data.</p>
Department of Conservation Submitter ID: 71759	PC1-10752	Method 3.11.4.3	AMEND Method 3.11.4.3 to place greater emphasis on the overall goal for Farm Environment Plans.	Support in part	FFNZ agrees it would be helpful to focus on the goal or objectives of FEPs but considers that ought to include flexibility and the MPA framework proposed in FFNZ's submission on Variation 1.
Eight Mile Farms Ltd Submitter ID: 71395	PC1-1154	Method 3.11.4.3	AMEND Method 3.11.4.3 to focus on land use capability of individual properties and work with all stakeholders including sub-catchment groups to develop a technically robust and economically sustainable Farm Environment Plan. AND AMEND to extend the timelines	Oppose in part	<p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching.</p> <p>FFNZ supports an approach based on considering</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			to complete Farm Environment Plans. AND AMEND to ensure the potential high cost of completing a Farm Environment Plan is addressed or subsidised.		sub-catchment characteristics and tailored and proportionate actions in FEPs. FFNZ supports extending the timeframes for FEPs, particularly given the delay over the past two years. FFNZ agrees that the cost of obtaining FEPs needs to be addressed and managed.
Farm Environment Trust (Waikato) Submitter ID: 73798	PC1-5059	Method 3.11.4.3	Method 3.11.4.3: AMEND so that Farm Environment Plans are individually focused but able to be audited with consequences. AND AMEND so that the outcome of the Farm Environment Plans has to show the economic impact to the individual farm.	Support	FFNZ supports an approach based on considering sub-catchment characteristics and tailored and proportionate actions in FEPs. FFNZ also supports taking into account the resources reasonably available to a farm enterprise and considers that this is provided for in the MPA framework FFNZ proposes in its submission on Variation 1.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9831	Method 3.11.4.3	AMEND Method 3.11.4.3 to ensure it can be implemented as intended, working with approved nationally consistent industry certification schemes.	Support in part Oppose in part	FFNZ considers that Method 3 needs some changes to ensure that it recognises flexibility is needed in the implementation of FEPs (and refers to the reasons set out in its submission on Variation 1). If this is what is meant by the submitter then FFNZ supports the proposal. However, FFNZ would not support the proposal if it meant that the FEP framework was no longer tailored or became more stringent.
Fletcher Trust Submitter ID: 73848	PC1-5998	Method 3.11.4.3	ADD provision for discretion to allow Farm Environment Plans to be prepared by someone other than a Certified Farm Environment Planner. AND AMEND rules to ensure the following conditions apply to a controlled activity (after 1 July 2020): <u>"1. The property is registered with the Waikato Regional Council in</u>	Support in part Oppose in part	FFNZ supports tailored, risk based FEPs but considers that they also need to be flexible and based on MPA (and refers to its submission on Variation 1). FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of

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			<p><u>conformance with Schedule A; and</u> <u>2. A Nitrogen Reference Point is calculated for the property or enterprise in conformance with Schedule B and was provided to the Waikato Regional Council within the period 1 September 2018 to 31 March 2019; and</u> <u>3. The five year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; and</u> <u>4. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C."</u> AND AMEND to remove reference to priority catchments and associated dates from Matters of Control.</p>		<p>FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.</p> <p>Having said this, FFNZ agrees that farmers need to be involved in the preparation of FEPs. FFNZ is also concerned that there is likely to be a supply issue with a likely lack of certified planners and considers that this ought to be addressed and provided for.</p> <p>FFNZ supports the prioritisation of sub-catchments but has concerns about the method to identify the priorities and considers the dates ought to be extended.</p>
Hamilton, Malibu Submitter ID: 74083	PC1-10361	Method 3.11.4.3	<p>AMEND PPC1 so that Farm Environment Plans are required by consent rather than permitted activities. AND AMEND to require audits to assess farm practice against Farm Environment Plans</p>	Oppose	<p>FFNZ considers that it is important that flexibility is provided to either obtain an FEP via a permitted activity or a controlled activity consent.</p> <p>FFNZ does not support micro management of FEP actions and considers that appropriate flexibility needs to be provided for things like climatic events, economic events etc (and refers to the reasons set out in FFNZ's submission on Variation 1).</p>
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5756	Method 3.11.4.3	<p>AMEND Method 3.11.4.3 by replacing OR supplementing the Farm Environment Plans with Best Practicable Options for all land use activities to be adopted within</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by Oji</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			workable but prompt time frames.		because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc. Therefore FFNZ's position on the current submission point would depend on what is meant by BPO.
Hill Country Farmers Group Submitter ID: 73321	PC1-7810	Method 3.11.4.3	AMEND Method 3.11.4.3 to provide clarification on slope and fencing requirements on hill country where topography is variable across paddocks and adjoining watercourses. AND AMEND the definition of a Certified Farm Environment Planner to encompass experience as a qualification and to ensure that enough planners are available to meet demand. AND AMEND to enable landowner accreditation to allow landowners who meet criteria set by an industry body and Waikato Regional Council to develop their own Farm Environment Plans.	Support in part Oppose in part	Instead of specifying slope and fencing requirements, FFNZ considers that a more appropriate approach is to set minimum standards based on stock units and provide for tailored solutions within FEPs (as set out in FFNZ's submission on Variation 1). FFNZ is also concerned that there is likely to be a supply issue with a likely lack of certified planners and considers that this ought to be addressed and provided for. FFNZ has concerns about land owner accreditation if that means that WRC would need to retain control over content of FEPs. FFNZ considers that a strength of the certified planner approach is that there is no need for council to exercise control over the content of the FEP.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10091	Method 3.11.4.3	RETAIN Method 3.11.4.3	Support in part Oppose in part	FFNZ considers that Method 3 needs some changes to ensure that it recognises flexibility is needed in the implementation of FEPs (and refers to the reasons set out in its submission on Variation 1). FFNZ also considers it ought to be based on FFNZ's MPA framework.
Maniapoto Maori Trust Board Submitter ID:	PC1-9316	Method 3.11.4.3	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens	Oppose	FFNZ considers that a certified farm environment planner should propose the mitigations and not WRC.

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73730			and specify <u>the range of relevant mitigation</u> actions to reduce those risks in order to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with more <u>standardised</u> monitoring programme and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results</u> . <u>Waikato Regional Council will prepare an audit schedule for undertaking</u> robust third party audit (independent of the farmer and Certified Farm Environment Planner) <u>and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans.</u> "		FFNZ supports reasonable monitoring but is concerned that appropriate flexibility ought to be provided to respond to changing circumstances etc as set out in its submission on Variation 1. FFNZ also considers that a pragmatic approach ought to be adopted and that standardised monitoring will not be suitable, reasonable or cost effective. FFNZ is also concerned that a standardised approach of assessing 10% of sites will also not result in a sensible, practical or affordable outcome.
Miraka Limited Submitter ID: 73492	PC1-8850	Method 3.11.4.3	RETAIN Method 3.11.4.3.	Support in part Oppose in part	FFNZ considers that Method 3 needs some changes to ensure that it recognises flexibility is needed in the implementation of FEPs (and refers to the reasons set out in its submission on Variation 1). FFNZ also considers it ought to be based on FFNZ's MPA framework.
New Zealand Institute of Primary Industry Management - Waikato Branch Submitter ID: 73558	PC1-8447	Method 3.11.4.3	AMEND Method 3.11.4.3 by inserting an additional schedule to 3.11.4.3 which defines the process for auditing of Farm Environment Plans, OR AMEND PPC1 by adding a new method which defines the process for	Support in part Oppose in part	While FFNZ agrees that clarity re audit, monitoring and compliance would be helpful, FFNZ is concerned that appropriate flexibility ought to be provided to respond to changing circumstances etc as set out in its submission on Variation 1. FFNZ also considers that a pragmatic approach ought to be adopted and that standardised monitoring will

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			auditing of Farm Environment Plans.		not be suitable, reasonable or cost effective. FFNZ is also concerned that a standardised approach of assessing 10% of sites will also not result in a sensible, practical or affordable outcome.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4627	Method 3.11.4.3	RETAIN Method 3.11.4.3 and ensure that the level of information and actions is relevant to the land use and commensurate with the effect on the environment.	Support in part Oppose in part	FFNZ considers that Method 3 needs some changes to ensure that it recognises flexibility is needed in the implementation of FEPs (and refers to the reasons set out in its submission on Variation 1). FFNZ also considers it ought to be based on FFNZ's MPA framework. FFNZ supports a tailored and proportionate FEP approach.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11847	Method 3.11.4.3	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks in order to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with more <u>standardised</u> monitoring programme and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results</u> . <u>Waikato Regional Council will prepare an audit schedule for undertaking</u> robust third party audit (independent of the farmer and Certified Farm Environment Planner) <u>and monitoring of Farm Environment</u>	Oppose	FFNZ considers that a certified farm environment planner should propose the mitigations and not WRC. FFNZ supports reasonable monitoring but is concerned that appropriate flexibility ought to be provided to respond to changing circumstances etc as set out in its submission on Variation 1. FFNZ also considers that a pragmatic approach ought to be adopted and that standardised monitoring will not be suitable, reasonable or cost effective. FFNZ is also concerned that a standardised approach of assessing 10% of sites will also not result in a sensible, practical or affordable outcome.

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			<u>Plans and a randomised method for the selection of Farm Environment Plans."</u>		
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6919	Method 3.11.4.3	DELETE Method 3.11.4.3 OR AMEND so that Method 3.11.4.3 is consistent with the alternative approach proposed in the submission which incorporates aspects of the Farm Environment Plan into the permitted activity standards, and relies on the Farm Environment Plan only as a means of providing information to support applications for a resource consent.	Oppose	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc. FFNZ also supports the option of permitted and controlled activity FEPs.
Pamu Farms of New Zealand Submitter ID: 74000	PC1-6004	Method 3.11.4.3	AMEND Method 3.11.4.3 to explore bonded compliance mechanisms for Farm Environment Plans in addition to consent enforcement.	Oppose	FFNZ is concerned that a bond proposal would result in significant cost for no net benefit and is also concerned that this would not provide appropriate flexibility to amend and adjust FEPs in response to climatic events, economic events etc (and refers to its submission on Variation 10).
Pinnell, Graham Submitter ID: 74007	PC1-4447	Method 3.11.4.3	ADD commentary to Method 3.11.4.3 to ensure farmers and rural professionals have input into the development of a menu of Best Management Practices and minimum standards to meet Objective 3.	Support in part Oppose in part	In principle, FFNZ agrees to sensible, practical and affordable minimum standards and then tailored and proportionate actions in FEPs. FFNZ agrees that industry should be involved in the development of minimum standards or mitigation options. However, FFNZ considers the bar of "best management practices" is too high and ought to be industry agreed GMP or similar.
Primary Land Users Group Submitter ID: 71427	PC1-11169	Method 3.11.4.3	AMEND method 3.11.4.3 to include experience as a qualification through broadening the Certified Farm Environment Planner definition AND AMEND to ensure a guidance document is provided, including clarification on slope interpretation	Support in part	In principle, FFNZ agrees the qualifications and experience of CFEPs could be broadened. FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			and fencing, stock watering and stock crossing requirements.		<p>prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.</p> <p>FFNZ supports the development of an implementation guide. It considers that removing a slope requirement on fencing and instead basing stock exclusion on a stocking rate (or similar approach) would address the submitter's concerns (FFNZ refers to its submission on Variation 1).</p>
Raukawa Charitable Trust Submitter ID: 74073	PC1-10562	Method 3.11.4.3	<p>AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks in order to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with more <u>standardised</u> monitoring programme and then <u>potentially moving to less frequent monitoring based on risk assessment and the outcome of previous monitoring results.</u> <u>Waikato Regional Council will prepare an audit schedule for undertaking</u> robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring of Farm Environment Plans <u>and a randomised method for the selection of Farm Environment Plans.</u>"</p>	Oppose	<p>FFNZ considers that a certified farm environment planner should propose the mitigations and not WRC.</p> <p>FFNZ supports reasonable monitoring but is concerned that appropriate flexibility ought to be provided to respond to changing circumstances etc as set out in its submission on Variation 1. FFNZ also considers that a pragmatic approach ought to be adopted and that standardised monitoring will not be suitable, reasonable or cost effective. FFNZ is also concerned that a standardised approach of assessing 10% of sites will also not result in a sensible, practical or affordable outcome.</p>

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Ravensdown Limited Submitter ID: 74058	PC1-10126	Method 3.11.4.3	RETAIN the intent of Method 3.11.4.3. AND AMEND the certification process for the preparation and certification of Farm Environment Plans by adopting the Certified Nutrient Management Advisor programme. AND ADOPT the definitions sought in this submission relating to certification programmes.	Support in part Oppose in part	FFNZ considers that Method 3 needs some changes to ensure that it recognises flexibility is needed in the implementation of FEPs (and refers to the reasons set out in its submission on Variation 1). FFNZ also considers it ought to be based on FFNZ's MPA framework. FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome. If the nutrient management programme is a suitable qualification and would satisfy WRC then FFNZ considers it may be an appropriate proposal.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11117	Method 3.11.4.3	Provide further and better particulars regarding Waikato Regional Council's expectations as to standard and content. AND refer to relief sought regarding farming activity rules.	Support in part	FFNZ agrees that greater clarity regarding FEPs would be helpful and considers that in developing guidance WRC ought to work with all stakeholders.
Taupo District Council Submitter ID: 74207	PC1-8121	Method 3.11.4.3	RETAIN the intent of Method 3.11.4.3, AND AMEND to include provision of a funding stream to assist in the development and implementation of Farm Environment Plans.	Support in part Oppose in part	FFNZ considers that Method 3 needs some changes to ensure that it recognises flexibility is needed in the implementation of FEPs (and refers to the reasons set out in its submission on Variation 1). FFNZ also considers it ought to be based on FFNZ's MPA framework. FFNZ supports the option of funding to assist with FEPs.
Te Arawa River Iwi	PC1-11796	Method 3.11.4.3	AMEND Method 3.11.4.3 to read:	Oppose	FFNZ considers that a certified farm environment

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Trust Submitter ID: 73697			"Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks in order to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with more <u>standardised</u> monitoring programme and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results</u> . <u>Waikato Regional Council will prepare an audit schedule for undertaking</u> robust third party audit (independent of the farmer and Certified Farm Environment Planner) <u>and monitoring of</u> Farm Environment Plans and a <u>randomised method for the selection of Farm Environment Plans.</u> "		planner should propose the mitigations and not WRC. FFNZ supports reasonable monitoring but is concerned that appropriate flexibility ought to be provided to respond to changing circumstances etc as set out in its submission on Variation 1. FFNZ also considers that a pragmatic approach ought to be adopted and that standardised monitoring will not be suitable, reasonable or cost effective. FFNZ is also concerned that a standardised approach of assessing 10% of sites will also not result in a sensible, practical or affordable outcome.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8209	Method 3.11.4.3	AMEND Method 3.11.4.1 to ensure that past and future discharges are accurately recorded AND ensure that Farm Environment Plan implementation is monitored.	Oppose	FFNZ is concerned that there are significant issues with recording diffuse discharges at a property level including that they cannot be measured. FFNZ is also concerned about micro management of FEPs and considers that flexibility needs to be provided to respond to changing circumstances. FFNZ is concerned that the submitter's proposal will likely impose significant cost for not net benefit.
Timberlands Limited Submitter ID:	PC1-3413	Method 3.11.4.3	AMEND Method 3.11.4.3 to require a frequent and comprehensive monitoring programme to audit Farm	Oppose	FFNZ is concerned that there are significant issues with recording diffuse discharges at a property level including that they cannot be measured. FFNZ is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
73036			Environment Plans.		also concerned about micro management of FEPs and considers that flexibility needs to be provided to respond to changing circumstances. FFNZ is concerned that the submitter's proposal will likely impose significant cost for not net benefit.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10392	Method 3.11.4.3	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks in order to bring about reductions... develop best practints,... Waikato Regional Council will... Farm Environment Plans, starting with more <u>a standardised monitoring programme</u> and then <u>potentially moving to less frequent monitoring based on risk assessment and the outcome of previous monitoring results.</u> <u>Waikato Regional Council will prepare an audit schedule for undertaking robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</u>	Oppose	FFNZ considers that a certified farm environment planner should propose the mitigations and not WRC. FFNZ supports reasonable monitoring but is concerned that appropriate flexibility ought to be provided to respond to changing circumstances etc as set out in its submission on Variation 1. FFNZ also considers that a pragmatic approach ought to be adopted and that standardised monitoring will not be suitable, reasonable or cost effective. FFNZ is also concerned that a standardised approach of assessing 10% of sites will also not result in a sensible, practical or affordable outcome.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3409	Method 3.11.4.3	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks in order to bring about	Oppose	FFNZ considers that a certified farm environment planner should propose the mitigations and not WRC. FFNZ supports reasonable monitoring but is concerned that appropriate flexibility ought to be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with more <u>standardised</u> monitoring programme and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment and the <u>outcome of previous monitoring results</u>.</p> <p><u>Waikato Regional Council will prepare an audit schedule for undertaking robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans.</u>"</p>		<p>provided to respond to changing circumstances etc as set out in its submission on Variation 1. FFNZ also considers that a pragmatic approach ought to be adopted and that standardised monitoring will not be suitable, reasonable or cost effective. FFNZ is also concerned that a standardised approach of assessing 10% of sites will also not result in a sensible, practical or affordable outcome.</p>
Waikato Environment Centre Submitter ID: 73436	PC1-6237	Method 3.11.4.3	AMEND Method 3.11.4.3 to provide for monitoring of compliance to be undertaken by a truly independent party	Support in part	<p>FFNZ agrees that is merit in having an independent entity responsible for monitoring and compliance. FFNZ supports reasonable monitoring but is concerned that appropriate flexibility ought to be provided to respond to changing circumstances etc as set out in its submission on Variation 1. FFNZ also considers that a pragmatic approach ought to be adopted and that standardised monitoring will not be suitable, reasonable or cost effective.</p>
Waikato Regional Council Submitter ID: 72890	PC1-3102	Method 3.11.4.3	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare parameters and minimum requirements for the development of a certification process for professionals <u>Farm Environment Planners</u> to develop, certify and	Oppose	<p>FFNZ considers that a certified farm environment planner should propose the mitigations and not WRC.</p> <p>FFNZ supports reasonable monitoring but is concerned that appropriate flexibility ought to be provided to respond to changing circumstances etc</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>monitor Farm Environment Plans in a consistent approach across the region. A The Farm Environment Plan will be prepared by a certified person as per the requirements outlined in Schedule 1, and will assess the risk of diffuse discharges of...</p> <p>Waikato Regional Council will take a a risk based approach to monitoring Farm Environment Plans, starting with more frequent monitoring and then moving to monitoring based on risk assessment. Robust third party audit (independent of the farmer/landowner and Certified Farm Environment Planner) and monitoring will be required."</p>		<p>as set out in its submission on Variation 1. FFNZ also considers that a pragmatic approach ought to be adopted and that standardised monitoring will not be suitable, reasonable or cost effective. FFNZ is also concerned that a standardised approach of assessing 10% of sites will also not result in a sensible, practical or affordable outcome.</p>
<p>Wairakei Pastoral Ltd Submitter ID: 74095</p>	<p>PC1-11359</p>	<p>Method 3.11.4.3</p>	<p>AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare parameters and minimum requirements for the development of a certification process for professionals to develop, certify and monitor Farm Environment Plans in a consistent approach across the region. A Farm Environment Plan will be prepared by a certified an <u>appropriately qualified or experienced</u> person as per the requirements... in order to bring about reductions in the discharges of those contaminants. Waikato Regional Council will develop guidance for risk assessments, auditing and compiling</p>	<p>Support in part Oppose in part</p>	<p>FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.</p> <p>FFNZ would support a reasonable proposal for certification of an experienced person or for a person to simply be qualified or experienced provided that WRC retained no control over content of FEPs.</p> <p>FFNZ considers there is merit in WRC developing guidance but this needs to be done in consultation</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Farm Environment Plans ... (independent of the farmer and Certified Farm Environment Planner/Plan author) and monitoring will be required."		with stakeholders.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2125	Method 3.11.4.3	AMEND Method 3.11.4.3 to provide Best Practice Management Guidelines and mitigations that apply to a range of farming practices, land types and other biophysical factors so that they can be included in Farm Environment Plans and applied across all properties and enterprises within the region.	Support in part Oppose in part	In principle, FFNZ agrees to sensible, practical and affordable minimum standards and then tailored and proportionate actions in FEPs. FFNZ agrees that industry should be involved in the development of minimum standards or mitigation options. However, FFNZ considers the bar of "best management practices" is too high and ought to be industry agreed GMP or similar.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10922	Method 3.11.4.4	AMEND Method 3.11.4.4 to ensure at a minimum maintenance, or where degraded, enhancement during the period of PPC1 operation AND AMEND to apply short term standards and targets based on appropriate attributes such as Trophic Level Indicator and ensure they are shown in the attribute table for the Lakes Freshwater Management Units AND AMEND Method 3.11.4.4(g) to read: " Develop <u>Include</u> a set of short term water quality attribute targets for each Freshwater Management Unit <u>as a minimum state to improve from in achieving the desired state.</u> "	Oppose	FFNZ is concerned that adopting an approach that at a farm or individual property level requires every contaminant to be reduced or maintained or water quality improved is too high a threshold and will impose significant cost for no net benefit. FFNZ does not support amending short term targets for reasons including that the targets are already too stringent, impose significant cost for no net benefit and there is no reliable basis to establish a TLI.
Balle Bros Group Submitter ID:	PC1-11414	Method 3.11.4.4	AMEND method 3.11.4.4 to specifically include management of	Support	FFNZ agrees that pest species need to be managed to improve water quality.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
67834			pest species.		
Cameron, Bruce Submitter ID: 60603	PC1-6379	Method 3.11.4.4	RETAIN the 'working with others in relation to lakes and Whangamarino Wetland' and the 'managing pest weeds and fish' sections of Method 3.11.4.4. AND AMEND PPC1 to include the management of pest weeds and fish in the policies, objectives and rules in the Waikato and Waipā Catchments.	Support	FFNZ agrees that water quality improvements will required council to work with others and manage pests. FFNZ agrees that pest manage could also be included in other parts of PC1.
Department of Conservation Submitter ID: 71759	PC1-10753	Method 3.11.4.4	AMEND Method 3.11.4.4 to implement and action existing lake management plans and strategies as a priority. AND AMEND to provide greater certainty regarding the management of shallow lakes, including providing objectives, targets and limits for the future management and enhancement of shallow lakes. AND AMEND to ensure that existing farm plans are enforced and the expansion of work on private properties, beyond works already undertaken on Council and public conservation estate reserves, be undertaken as a matter of priority. This should include; retirement of wetland areas, increasing setbacks from waterways, and design and construction of sediment traps in key locations. AND AMEND so that where there is an evidence-based description of the problem, the focus needs to be on	Oppose	FFNZ considers that existing lake management plans may need to be revised or reconsidered in the context of Method 4. FFNZ considers that insufficient information is known about shallow lakes and it is premature to implement objectives, targets, limits. FFNZ considers that ought o be considered through engagement with the community as proposed in Method 4. FFNZ does not support turning existing farm plans into regulatory plans or enforcement of works on private property. FFNZ considers that this ought to be considered in a non regulatory framework and as proposed in Method 4. FFNZ supports an evidence based description of the problem but considers that it is premature to put that into Method 4 now and considers that that ought to be considered through the community process proposed in Method 4.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			using this information in implementing lake catchment plans. AND RETAIN Method 3.11.4.4 (d), (e), (f) and (g)		
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9832	Method 3.11.4.4	RETAIN Method 3.11.4.4.	Support	FFNZ supports the considered approach to management of the lakes and Whangamarino Wetland as proposed in Method 4. It supports a collaborative process with all affected members of the community and stakeholders, and robust problem identification and solution funding to address the water quality issues.
Fulton Hogan Limited Submitter ID: 74048	PC1-10869	Method 3.11.4.4	AMEND Method 3.11.4.4(g) to read: "Develop a set of 10-year water quality attribute targets^ for each land Freshwater Management Unit."	Support in part	FFNZ supports the use of consistent terminology.
GBC Winstone Submitter ID: 73992	PC1-3611	Method 3.11.4.4	AMEND Method 3.11.4.4 g. as follows: "Develop a set of 10-year water quality attribute targets^ for each lake..."	Support in part	FFNZ supports the use of consistent terminology.
Hamilton City Council Submitter ID: 74051	PC1-11039	Method 3.11.4.4	AMEND Method 3.11.4.4 as follows: "Waikato Regional Council, working with others, will:... b. <u>With Community involvement</u> , Pprepare and implement Lake Catchment Plans with community involvement which include:... <u>ba. 'Community' in b includes relevant territorial authorities.</u> "	Support in part	FFNZ supports community involvement and to the extent that the submission point does not change that, FFNZ supports it. FFNZ considers all relevant stakeholders ought to be included and to the extent that territorial authorities are a relevant stakeholder FFNZ considers they ought to also be involved.
Hill Country Farmers Group Submitter ID: 73321	PC1-7816	Method 3.11.4.4	AMEND Method 3.11.4.4 and targets to include the management of Koi Carp.	Support in part	FFNZ considers that the management of koi carp and other pest species will be an important part of improving water quality and their effect on water quality ought to be taken into account and addressed.
Lumbercorp NZ Ltd	PC1-10010	Method 3.11.4.4	RETAIN Method 3.11.4.4	Support in	FFNZ supports the considered approach to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 71753			AND include Lumbercorp NZ Ltd in any working group or consultative group set up for Lake Waikare sub-catchment planning.	part	management of the lakes and Whangamarino Wetland as proposed in Method 4. It supports a collaborative process with all affected members of the community and stakeholders, and robust problem identification and solution funding to address the water quality issues. FFNZ considers that all stakeholders or affected members of the community need to be involved.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9317	Method 3.11.4.4	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with others stakeholders, will: a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u> a-b. Build on the Shallow Lakes Management Plan by... b-c. <u>Prepare and implement Lake Catchment Plans with community involvement which include :</u> i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u> "	Support in part Oppose in part	FFNZ considers that all affected parties need to be involved. To the extent that stakeholders includes all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others." FFNZ considers that the FMUs need to be manageable and reflect the relevant sub-catchments contributing towards the lake water quality. FFNZ would support a review of the lake FMUs provided that any changes were focused on achieving more appropriate FMUs and did not result in unwieldy or too wide an area, for example. FFNZ considers that the community needs to be involved in the preparation and implementation of a catchment plan. FFNZ considers its involvement needs to be wider than just the vision.
Miraka Limited Submitter ID: 73492	PC1-8853	Method 3.11.4.4	RETAIN Method 3.11.4.4	Support	FFNZ supports the considered approach to management of the lakes and Whangamarino Wetland as proposed in Method 4. It supports a collaborative process with all affected members of the community and stakeholders, and robust problem identification and solution funding to address the water quality issues.
National Wetland	PC1-10761	Method 3.11.4.4	AMEND Method 3.11.4.4 to read:	Oppose	FFNZ does not support extending this method to all

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Trust Submitter ID: 73420			"3.11.4.4 lakes and Whangamarino wetlands... e. Support research and... shallow lakes and Whangamarino wetlands (e.g. lake modelling, lake bed sediment treatments, <u>wetland restoration methods</u> , constructed wetlands, floating wetlands,... f. Support lake and Whangamarino wetland restoration programmes ..."		wetlands for reasons including that the definition of wetlands is uncertain (and could include areas of wet pasture) and such an approach is likely to result in significant cost for no net benefit.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11848	Method 3.11.4.4	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with others stakeholders, will: a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u> a-b. Build on the Shallow Lakes Management Plan by... b-c. <u>Prepare and implement Lake Catchment Plans with community involvement which include :</u> i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u> "	Support in part Oppose in part	FFNZ considers that all affected parties need to be involved. To the extent that stakeholders includes all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others." FFNZ considers that the FMUs need to be manageable and reflect the relevant sub-catchments contributing towards the lake water quality. FFNZ would support a review of the lake FMUs provided that any changes were focused on achieving more appropriate FMUs and did not result in unwieldy or too wide an area, for example. FFNZ considers that the community needs to be involved in the preparation and implementation of a catchment plan. FFNZ considers its involvement needs to be wider than just the vision.
NZ Transport Agency Submitter ID: 73542	PC1-4837	Method 3.11.4.4	AMEND Method 3.11.4.4 as follows: "...prepare and implement Lake Catchment Plans with community <u>and stakeholder involvement...</u> "	Support	FFNZ agrees that all relevant members of the community and stakeholders ought to be involved in the preparation of catchment plans.
Primary Land Users Group Submitter ID:	PC1-11170	Method 3.11.4.4	AMEND Method 3.11.4.4 to include and prioritise the management of pest species, including koi carp.	Support	FFNZ agrees that all sources of water quality issues ought to be considered and investigated and that pest species seem to be a key issue and ought to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
71427					be prioritised.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10563	Method 3.11.4.4	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with others stakeholders, will: a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u> a-b. Build on the Shallow Lakes Management Plan by... b-c. Prepare and implement Lake Catchment Plans with community involvement which include : i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u> "	Support in part Oppose in part	FFNZ considers that all affected parties need to be involved. To the extent that stakeholders includes all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others." FFNZ considers that the FMUs need to be manageable and reflect the relevant sub-catchments contributing towards the lake water quality. FFNZ would support a review of the lake FMUs provided that any changes were focused on achieving more appropriate FMUs and did not result in unwieldy or too wide an area, for example. FFNZ considers that the community needs to be involved in the preparation and implementation of a catchment plan. FFNZ considers its involvement needs to be wider than just the vision.
Ravensdown Limited Submitter ID: 74058	PC1-10127	Method 3.11.4.4	RETAIN the intent of Method 3.11.4.4 AND AMEND to define what a Lake Catchment Plan is to cover.	Support in part	FFNZ supports the considered approach to management of the lakes and Whangamarino Wetland as proposed in Method 4. It supports a collaborative process with all affected members of the community and stakeholders, and robust problem identification and solution funding to address the water quality issues. FFNZ has concerns that if too much detail or specificity about the content of a Lake Catchment Plan was provided that would be inflexible and not result in a tailored plan that would best address the particular lake.
Te Arawa River Iwi Trust Submitter ID:	PC1-11797	Method 3.11.4.4	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with others stakeholders, will:	Support in part	FFNZ considers that all affected parties need to be involved. To the extent that stakeholders includes all affected parties FFNZ would agree with the first

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
73697			<p>a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u></p> <p>a-b. Build on the Shallow Lakes Management Plan by...</p> <p>b-c. Prepare and implement Lake Catchment Plans with community involvement which include :</p> <p>i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u>"</p>	Oppose in part	<p>change but if it is narrower, FFNZ prefers the word "others."</p> <p>FFNZ considers that the FMUs need to be manageable and reflect the relevant sub-catchments contributing towards the lake water quality. FFNZ would support a review of the lake FMUs provided that any changes were focused on achieving more appropriate FMUs and did not result in unwieldy or too wide an area, for example.</p> <p>FFNZ considers that the community needs to be involved in the preparation and implementation of a catchment plan. FFNZ considers its involvement needs to be wider than just the vision.</p>
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10398	Method 3.11.4.4	<p>AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with othersstakeholders, will:</p> <p>a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u></p> <p>a-b. Build on the Shallow Lakes Management Plan by...</p> <p>b-c. Prepare and implement Lake Catchment Plans with community involvement which include :</p> <p>i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u>"</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that all affected parties need to be involved. To the extent that stakeholders includes all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others."</p> <p>FFNZ considers that the FMUs need to be manageable and reflect the relevant sub-catchments contributing towards the lake water quality. FFNZ would support a review of the lake FMUs provided that any changes were focused on achieving more appropriate FMUs and did not result in unwieldy or too wide an area, for example.</p> <p>FFNZ considers that the community needs to be involved in the preparation and implementation of a catchment plan. FFNZ considers its involvement needs to be wider than just the vision.</p>
Waikato and Waipa River Iwi	PC1-3410	Method 3.11.4.4	<p>AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working</p>	Support in part	FFNZ considers that all affected parties need to be involved. To the extent that stakeholders includes

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74035			with others stakeholders, will: a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u> a-b. Build on the Shallow Lakes Management Plan by... b-c. Prepare and implement Lake Catchment Plans with community involvement which include : i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u> "	Oppose in part	all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others." FFNZ considers that the FMUs need to be manageable and reflect the relevant sub-catchments contributing towards the lake water quality. FFNZ would support a review of the lake FMUs provided that any changes were focused on achieving more appropriate FMUs and did not result in unwieldy or too wide an area, for example. FFNZ considers that the community needs to be involved in the preparation and implementation of a catchment plan. FFNZ considers its involvement needs to be wider than just the vision.
Waikato Regional Council Submitter ID: 72890	PC1-3103	Method 3.11.4.4	AMEND Method 3.11.4.4(b) to read: "Prepare and implement Lake Catchment Plans <u>for priority lakes</u> with community involvement..." AMEND Method 3.11.4.4(g) to read: "Develop a set of 10-year water quality attribute^ targets^ for each lake Freshwater Management Unit^ <u>to develop a future plan change</u> ".	Support in part	FFNZ supports focusing on priority lakes. FFNZ supports a future plan change process to implement any catchment plan developed where that is appropriate.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11360	Method 3.11.4.4	RETAIN Method 3.11.4.4 as notified or amended by similar wording to like effect.	Support	FFNZ supports the considered approach to management of the lakes and Whangamarino Wetland as proposed in Method 4. It supports a collaborative process with all affected members of the community and stakeholders, and robust problem identification and solution funding to address the water quality issues.
Ata Rangi 2015 Limited Partnership	PC1-6160	Method 3.11.4.5	RETAIN Method 3.11.4.5.	Support in part	FFNZ supports the intent of Method 5 but considers that it requires changes including to ensure that a

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74045					robust problem definition and catchment forensic approach is adopted, and to ensure appropriate solutions are found without constraining or overly prescribing that process. FFNZ refers further to the reasons and amendments set out in its submission on Variation 1.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10933	Method 3.11.4.5	AMEND Method 3.11.4.5 to include provision for trading of contaminant loss rates between enterprises or properties in the same sub-catchment where the reductions required cannot be achieved whilst maintaining profitability on-farm AND AMEND to include the potential for collective consents to minimise the regulatory burden, as well as enable management to occur across multiple properties or landholdings.	Oppose	FFNZ does not support allocation for reasons including that there is no equitable or reliable way to allocate. FFNZ does not support trading of contaminant losses or collective consents for this reason and because the impacts on water quality are uncertain. In principle FFNZ would support an offsetting approach and considers that this would more likely address the issue raised by the submitter. FFNZ is also concerned about the potential power to catchment collective, potential for abuse of that power and potential significant cost.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11497	Method 3.11.4.5	AMEND Method 3.11.4.5 to provide for managing contaminant loads at a sub-catchment level AND much more targeted and prioritised use of Farm Environment Plans to suit sub-catchment priorities. AND AMEND to provide for sub-catchment collectives or nutrient user groups to encourage and empower catchment communities working together to improve water quality.	Oppose in part	While FFNZ supports a sub-catchment approach and tailoring FEPs to particular sub-catchments (particularly through catchment profiles established through FFNZ's submission on Variation 1 in respect of a new Method 5A), FFNZ does not support allocation of contaminant loads at a sub-catchment level for reasons including that it does not support allocation and is concerned about the potentially significant costs for no net benefits. While FFNZ supports non-regulatory sub-catchment planning and groups, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.
Buckley, Peter	PC1-1421	Method 3.11.4.5	RETAIN Method 3.11.4.5 managing	Support in	FFNZ supports the intent of Method 5 but considers

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Ross Submitter ID: 71423			diffuse discharges and water quality at a sub-catchment level AND AMEND PPC1 to reflect this method in the rules.	part	that it requires changes including to ensure that a robust problem definition and catchment forensic approach is adopted, and to ensure appropriate solutions are found without constraining or overly prescribing that process. FFNZ refers further to the reasons and amendments set out in its submission on Variation 1.
Cameron, Bruce Submitter ID: 60603	PC1-6380	Method 3.11.4.5	RETAIN the 'managing diffuse discharges and water quality on a sub-catchment level' sections of Method 3.11.4.5. AND AMEND the rules in PPC1 to reflect Method 3.11.4.5.	Support in part	FFNZ supports the intent of Method 5 but considers that it requires changes including to ensure that a robust problem definition and catchment forensic approach is adopted, and to ensure appropriate solutions are found without constraining or overly prescribing that process. FFNZ refers further to the reasons and amendments set out in its submission on Variation 1.
Charion Investment Trust Submitter ID: 71344	PC1-7767	Method 3.11.4.5	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with others to develop sub-catchment scale plans (where a catchment plan does not already exist) where it has been shown to be required. Sub-catchment scale planning, <u>considering ongoing scientific developments and new methodologies, will...</u> "	Support in part	FFNZ agrees that Method 5 requires amendment including to ensure that a robust problem definition and catchment forensic approach is adopted, and to ensure appropriate solutions are found without constraining or overly prescribing that process. Therefore, FFNZ supports changes to provide ongoing consideration of changes in science and methodologies.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10789	Method 3.11.4.5	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> others to develop sub-catchment scale plans (where a catchment plan does not already exist) <u>and where it has been shown to be required developing a plan would result in achieving the 10—year water quality attribute targets more efficiently.</u> Sub-	Support in part Oppose in part	FFNZ considers that all affected parties need to be involved. To the extent that "relevant stakeholders" includes all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others." FFNZ considers that plans should not be required where one already exists (but there should be the option to update it if the community considers it appropriate).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			catchment planning will:"		FFNZ considers that some lakes may not be able to reasonably meet 10 year targets and therefore a requirement that they do is too stringent and would likely impose significant cost for no net benefit.
Department of Conservation Submitter ID: 71759	PC1-10759	Method 3.11.4.5	AMEND Method 3.11.4.5 to provide greater clarity for plan users around when a sub-catchment plan will be required. AND AMEND Method 3.11.4.5 (a) to ensure that mitigation measures with the greatest environmental benefits be prioritised recognising that this could require high cost options to achieve desired outcomes.	Oppose	FFNZ considers that sub-catchment plans should be non regulatory and not "required" or compulsory. FFNZ considers that mitigation measures with environmental benefits should not be prioritised an that the costs ought to be weighed in assessing the appropriate mitigations.
Eight Mile Farms Ltd Submitter ID: 71395	PC1-1165	Method 3.11.4.5	RETAIN Method 3.11.4.5 as proposed. AND ENSURE consultation is undertaken with stakeholders to ensure a high level of support.	Support in part	FFNZ supports the intent of Method 5 but considers that it requires changes including to ensure that a robust problem definition and catchment forensic approach is adopted, and to ensure appropriate solutions are found without constraining or overly prescribing that process. FFNZ refers further to the reasons and amendments set out in its submission on Variation 1.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9833	Method 3.11.4.5	AMEND Method 3.11.4.5 to read: "a. Identify the causes of current water quality decline, identify cost-effective measures to bring about reductions in contaminant discharges to water, and coordinate the reductions..."	Support	FFNZ agrees that the focus ought to be on discharges to water and what is reaching the waterway (not what is leaving the root zone, for example).
Genesis Energy Limited Submitter ID: 74052	PC1-8818	Method 3.11.4.5	AMEND 3.11.4.5 to read: "Waikato Regional Council will work with others in accordance with <u>Method 3.11.4.1</u> to develop sub-catchment scale plans.... h. prioritise sub-catchment actions"	Support in part	FFNZ agrees that Method 1 helpfully defines what 'working with others' means. FFNZ also considers that sub-catchment actions ought to be prioritised but that flexibility ought to still be retained e.g. to consider lower cost options or to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					consider other actions at a property or other scale that will result in greater water quality improvements.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5759	Method 3.11.4.5	AMEND Method 3.11.4.5 to ensure that mitigation work is funded by land uses with diffuse discharges in proportion to contribution and benefit.	Oppose in part	While FFNZ supports a proportionate approach in principle, FFNZ considers that point source discharges ought to also be considered and that not all issues will be caused by a discharge e.g. pest fish and there will be public good that public funds ought to meet. Therefore, it is appropriate for a tailored approach to be adopted and for the sub-catchment to determine the appropriate funding approach.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10108	Method 3.11.4.5	AMEND Method 3.11.4.5: "Waikato Regional Council will work with others to develop sub-catchment scale plans <u>and decision support tools</u> (where a catchment plan <u>or tool</u> does not already exist) where it has been shown to be required. Sub-catchment scale planning will: a. Identify the causes of current water quality decline, identify cost-effective measures to bring about reductions in contaminant discharges, and coordinate the reductions required at a property, enterprise and sub-catchment scale (including recommendations for funding where there is a public benefit identified). b. Align works and services to reduce nitrogen, phosphorus, sediment and microbial pathogen discharges including riparian management, targeted reforestation, constructed wetlands, sediment traps and	Support in part Oppose in part	FFNZ has concerns that the decision support tools proposed by the submitter will be too rigid and will not result in the appropriate tailoring of plans to the particular sub-catchment. FFNZ supports sub-catchment and/or edge of field mitigations and the use of public funding for public good. However it has concerns about the use of public funds for decisions support tools if they are not flexible or robust, practical or effective.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			sediment detention bunds. c. Assess and determine effective and efficient placement of constructed wetlands at a sub-catchment scale to improve water quality. d. Support research that addresses the management of wetlands, including development of techniques to monitor ecological change and forecasting evolution of wetland characteristics resulting from existing land use in the wetland catchments. e. Integrate the regulatory requirements to fence waterways with the requirements for effective drainage scheme management. f Coordinate funding of mitigation work by those contributing to water quality degradation, in proportion to that contribution. g. Utilise public funds to support edge of field or catchment scale mitigations where those mitigations provide significant public benefit. <u>h. In support of method 3.11.4.7, utilise (and coordinate the management of) public funds to share the cost of constructing decision support tools meeting the criteria specified in Schedule 1C Table XX."</u>		
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-10032	Method 3.11.4.5	RETAIN Method 3.11.4.5 AND include Lumbercorp NZ Ltd in any working group or consultative	Support in part	FFNZ supports the intent of Method 5 but considers that it requires changes including to ensure that a robust problem definition and catchment forensic

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			group set up for Lake Waikare sub-catchment planning.		<p>approach is adopted, and to ensure appropriate solutions are found without constraining or overly prescribing that process. FFNZ refers further to the reasons and amendments set out in its submission on Variation 1.</p> <p>FFNZ considers that all stakeholders or affected members of the community need to be involved.</p>
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4446	Method 3.11.4.5	<p>AMEND PPC1 to protect remaining wetlands and gully seeps and create new incentives to encourage the creation or reinstatement of wetland areas.</p> <p>AND RETAIN PPC1 in its entirety.</p> <p>AND AMEND Method 3.11.4.5 so sub-catchment plans are required for all sub-catchments OR if not all sub-catchments then the Mangakotukutuku catchment needs to be included in order to implement Method 3.11.4.9.</p>	Oppose	<p>FFNZ does not support a blanket approach to protecting all wetlands and gullies for reasons including that it is likely to impose significant cost for no net benefit. FFNZ instead supports a tailored and proportionate approach that considers critical source areas, sub-catchment characteristics and the resources reasonably available.</p> <p>FFNZ does not support a regulatory requirement for sub-catchment plans. FFNZ considers this ought to be determined by the appropriate sub-catchment.</p>
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9318	Method 3.11.4.5	<p>AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where it has been shown to be required <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that all affected parties need to be involved. To the extent that "relevant stakeholders" includes all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others."</p> <p>FFNZ considers that plans should not be required where one already exists (but there should be the option to update it if the community considers it appropriate).</p> <p>FFNZ considers that some lakes may not be able to reasonably meet 10 year targets and therefore a requirement that they do is too stringent and would</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					likely impose significant cost for no net benefit.
Mercury NZ Limited Submitter ID: 73182	PC1-9590	Method 3.11.4.5	AMEND 3.11.4.5 to read: "Waikato Regional Council will work with others <u>in accordance with Method 3.11.4.1</u> to develop sub-catchment scale plans... <u>h. prioritise sub-catchment actions.</u> "	Support in part	FFNZ agrees that Method 1 helpfully defines what 'working with others' means. FFNZ also considers that sub-catchment actions ought to be prioritised but that flexibility ought to still be retained e.g. to consider lower cost options or to consider other actions at a property or other scale that will result in greater water quality improvements.
Miraka Limited Submitter ID: 73492	PC1-8855	Method 3.11.4.5	RETAIN Method 3.11.4.5.	Support in part	FFNZ supports the intent of Method 5 but considers that it requires changes including to ensure that a robust problem definition and catchment forensic approach is adopted, and to ensure appropriate solutions are found without constraining or overly prescribing that process. FFNZ refers further to the reasons and amendments set out in its submission on Variation 1.
National Wetland Trust Submitter ID: 73420	PC1-10762	Method 3.11.4.5	ADD a NEW provision to Method 3.11.4.5 following (c) and renumber subsequent provisions to read: <u>"d. identify areas of existing wetland and ensure these are not negatively impacted by construction of artificial wetlands or other mitigations.</u> e. Support research that addresses the management and restoration of wetlands, including..."	Oppose	FFNZ considers that a tailored approach is required and does not support a blanket requirement to identify and protect all wetlands for reasons including that this would likely impose significant cost for no net benefit.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4629	Method 3.11.4.5	RETAIN Method 3.11.4.5.	Support in part	FFNZ supports the intent of Method 5 but considers that it requires changes including to ensure that a robust problem definition and catchment forensic approach is adopted, and to ensure appropriate solutions are found without constraining or overly prescribing that process. FFNZ refers further to the reasons and amendments set out in its submission

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					on Variation 1.
New Zealand Steel Ltd Submitter ID: 73790	PC1-3730	Method 3.11.4.5	RETAIN Method 3.11.4.5.	Support in part	FFNZ supports the intent of Method 5 but considers that it requires changes including to ensure that a robust problem definition and catchment forensic approach is adopted, and to ensure appropriate solutions are found without constraining or overly prescribing that process. FFNZ refers further to the reasons and amendments set out in its submission on Variation 1.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11849	Method 3.11.4.5	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with relevant stakeholders to develop... and where it has been shown to be required developing a plan would result in achieving the 10-year water quality attribute targets more efficiently. Sub-catchment planning..."	Support in part Oppose in part	FFNZ considers that all affected parties need to be involved. To the extent that "relevant stakeholders" includes all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others." FFNZ considers that plans should not be required where one already exists (but there should be the option to update it if the community considers it appropriate). FFNZ considers that some lakes may not be able to reasonably meet 10 year targets and therefore a requirement that they do is too stringent and would likely impose significant cost for no net benefit.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6929	Method 3.11.4.5	AMEND Method 3.11.4.5 to reflect the alternative approach proposed in the submission If the alternative approach is not accepted THEN AMEND Method 3.11.4.5 to require sub-catchment plans to be prepared in sufficient time to support the timeframes for the development of Farm Environment Plans. AND AMEND by clarifying the basis	Oppose	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc. FFNZ considers that sub-catchment profiles ought to be created as set out in the amendments to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			and timeframes for implementing cost effective mitigation strategies. AND AMEND to require identified strategies to clearly require implementation using Farm Environment Plans [In line with Policy]. AND AMEND Clause f) to read: "...Coordinate funding of mitigation work by <u>those land uses with diffuse discharges</u> contributing to water quality degradation, in proportion to that contribution and benefit...."		Method 5A contained in FFNZ's submission on Variation 1. FFNZ does not support a regulatory approach for sub-catchment plans. While FFNZ supports a proportionate approach in principle, FFNZ considers that point source discharges ought to also be considered and that not all issues will be caused by a discharge e.g. pest fish and there will be public good that public funds ought to meet. Therefore, it is appropriate for a tailored approach to be adopted and for the sub-catchment to determine the appropriate funding approach.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10564	Method 3.11.4.5	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where it has been shown to be required <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."	Support in part Oppose in part	FFNZ considers that all affected parties need to be involved. To the extent that "relevant stakeholders" includes all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others." FFNZ considers that plans should not be required where one already exists (but there should be the option to update it if the community considers it appropriate). FFNZ considers that some lakes may not be able to reasonably meet 10 year targets and therefore a requirement that they do is too stringent and would likely impose significant cost for no net benefit.
Ravensdown Limited Submitter ID: 74058	PC1-10128	Method 3.11.4.5	RETAIN the intent of Method 3.11.4.5 as it is currently written.	Support in part	FFNZ supports the intent of Method 5 but considers that it requires changes including to ensure that a robust problem definition and catchment forensic approach is adopted, and to ensure appropriate solutions are found without constraining or overly prescribing that process. FFNZ refers further to the reasons and amendments set out in its submission

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					on Variation 1.
Rotorua Lakes Council Submitter ID: 73373	PC1-2514	Method 3.11.4.5	<p>AMEND Method 3.11.4.5 to read:</p> <ul style="list-style-type: none"> • <u>"Making development of sub-catchment plans a high priority implementation item.</u> • <u>Working closely with territorial authorities in development of sub-catchment plans.</u> • <u>Promoting sub-catchment plans that deliver broader benefits than individual property compliance."</u> <p>AND MAKE any consequential amendments.</p>	<p>Oppose in part</p> <p>Support in part</p>	<p>FFNZ considers that sub-catchment plans ought to be non-regulatory. It considers that catchment profiles ought to be prioritised as set out in its submission on Variation 1.</p> <p>FFNZ considers that WRC ought to work with the whole community and not just territorial authorities.</p> <p>FFNZ agrees that sub-catchment and/or edge of field actions may bring broader benefits (with less cost) than property level actions.</p>
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5740	Method 3.11.4.5	RETAIN Method 5 but ensure there is some measure of accountability and sanction for poor performance.	<p>Support in part</p> <p>Oppose in part</p>	FFNZ supports Method 5 but does not support a sanctions approach which would result in a regulatory approach to sub-catchment plans. FFNZ considers they ought to be non-regulatory, flexible and tailored.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11121	Method 3.11.4.5	RETAIN Method 3.11.4.5.	Support in part	FFNZ supports the intent of Method 5 but considers that it requires changes including to ensure that a robust problem definition and catchment forensic approach is adopted, and to ensure appropriate solutions are found without constraining or overly prescribing that process. FFNZ refers further to the reasons and amendments set out in its submission on Variation 1.
Taupo District Council Submitter ID: 74207	PC1-8125	Method 3.11.4.5	AMEND Method 3.11.4.5 to provide timeframes, funding options and priorities.	<p>Support in part</p> <p>Oppose in part</p>	FFNZ considers that consideration of timeframes, funding and priorities is helpful but considers this should not be compulsory because flexibility and sufficient tailoring is required and the proposal may constrain or preclude this.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11798	Method 3.11.4.5	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where it has been shown to be required <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."	Support in part Oppose in part	FFNZ considers that all affected parties need to be involved. To the extent that "relevant stakeholders" includes all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others." FFNZ considers that plans should not be required where one already exists (but there should be the option to update it if the community considers it appropriate). FFNZ considers that some lakes may not be able to reasonably meet 10 year targets and therefore a requirement that they do is too stringent and would likely impose significant cost for no net benefit.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8396	Method 3.11.4.5	RETAIN Method 3.11.4.5.	Support	FFNZ supports the intent of Method 5 but considers that it requires changes including to ensure that a robust problem definition and catchment forensic approach is adopted, and to ensure appropriate solutions are found without constraining or overly prescribing that process. FFNZ refers further to the reasons and amendments set out in its submission on Variation 1.
Timberlands Limited Submitter ID: 73036	PC1-3415	Method 3.11.4.5	AMEND Method 3.11.4.5 to read as: "Waikato Regional Council will work with relevant stakeholders to develop sub-catchment scale plans (where a catchment plan does not already exist) and where it has shown to be required <u>developing a plan would result in achieving the 10 year water quality attribute targets more efficiently.</u> Sub-catchment planning..."	Support in part Oppose in part	FFNZ considers that all affected parties need to be involved. To the extent that "relevant stakeholders" includes all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others." FFNZ considers that plans should not be required where one already exists (but there should be the option to update it if the community considers it appropriate). FFNZ considers that some lakes may not be able to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					reasonably meet 10 year targets and therefore a requirement that they do is too stringent and would likely impose significant cost for no net benefit.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10413	Method 3.11.4.5	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where it has been shown to be required <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."	Support in part Oppose in part	FFNZ considers that all affected parties need to be involved. To the extent that "relevant stakeholders" includes all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others." FFNZ considers that plans should not be required where one already exists (but there should be the option to update it if the community considers it appropriate). FFNZ considers that some lakes may not be able to reasonably meet 10 year targets and therefore a requirement that they do is too stringent and would likely impose significant cost for no net benefit.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3418	Method 3.11.4.5	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where it has been shown to be required <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."	Support in part Oppose in part	FFNZ considers that all affected parties need to be involved. To the extent that "relevant stakeholders" includes all affected parties FFNZ would agree with the first change but if it is narrower, FFNZ prefers the word "others." FFNZ considers that plans should not be required where one already exists (but there should be the option to update it if the community considers it appropriate). FFNZ considers that some lakes may not be able to reasonably meet 10 year targets and therefore a requirement that they do is too stringent and would likely impose significant cost for no net benefit.
Waikato Regional Council	PC1-3106	Method 3.11.4.5	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work	Support in part	FFNZ supports a tailored and flexible approach and considers that the use of the word "may" provides

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 72890			with others to develop ... where it has been shown to be required. Sub-catchment scale planning <u>will</u> may:..." AND AMEND Method 3.11.4.5 (e) to read: "Integrate the regulatory requirements to fence waterways water bodies with the requirements for effective drainage scheme management." AND DELETE Method 3.11.4.5 (f) in its entirety. AND REPLACE Method 3.11.4.5 (f) with: " <u>Develop funding models for sub-catchment planning processes and mitigation actions where an individual's contribution to funding is proportional to their contribution to sub-catchment contaminant discharges.</u> "		for that (as long as sub-catchment plans are prepared by working with the community and relevant stakeholders). FFNZ supports the development of funding models but considers flexibility needs to be provided for contributions because not all sources will be diffuse discharge e.g. pests and point source. Also, there should be no regulatory requirement to contribute.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11361	Method 3.11.4.5	ADD a NEW paragraph (b) to Method 3.11.4.5 to read: " <u>Resource consent applications should adopt an adaptive management and mitigation approach for the sub-catchment for modelling and measuring diffuse discharges from individual properties, enterprises and sub-catchments in relation to current and proposed land used, biophysical properties, and the climate and natural capacity of the landscape to attenuate contaminant losses.</u> " AND AMEND to renumber paragraphs (b)-(g) as (c)-(h) AND ADD a NEW paragraph (i) to	Oppose in part	In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available. However, FFNZ is concerned that the proposed approach might be confused for a precautionary approach and is based on information that is not available or has the potential to be misinformed or misused e.g. attenuation or natural capital is not known and should not be confused with LUC. While FFNZ supports non-regulatory sub-catchment planning and groups, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			read: " <u>In the interim, providing for enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change, in advance of the priority dates and events in Rule 3.11.5.4 and Table 3.11-2 will positively assist in achieving a tailored approach to sub-catchment mitigation and implementing Policies 2 and 9.</u> "		and/or self regulate.
Waitomo District Council Submitter ID: 73688	PC1-10322	Method 3.11.4.5	AMEND Method 3.11.4.5 and Policy 9 to make the development of sub-catchment plans a high priority implementation item OR ADD a NEW sub-catchment management policy to make the development of sub-catchment plans a high priority implementation item AND AMEND to focus sub-catchment plan development and implementation on Priority 1 sub-catchments first AND AMEND to include working closely with territorial authorities in the development of sub-catchment plans AND AMEND to promote sub-catchment plans that deliver broader benefits than individual property compliance.	Support in part Oppose in part	While FFNZ considers that catchment profiles as provided for in its submission on Variation 1 ought to be prioritised, it is concerned about prioritising sub-catchment planning and considers that ought to be non-regulatory and determined by the community. FFNZ also has concerns about how the sub-catchments have been prioritised and the right ones might not be "priority one." It prefers a tailored and proportionate approach that appropriately considers priorities and does this in consultation with the community. FFNZ considers all relevant members of the community ought to be involved, not just territorial authorities. FFNZ agrees that sub-catchment and edge of field actions may be more appropriate than property scale interventions.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6162	Method 3.11.4.6	AMEND Method 3.11.4.6 to include reference to Waikato Regional Council providing a fund to assist land owners, including financial incentives to re-purpose or retire land.	Support	FFNZ supports a range of funding options to assist with mitigations including WRC establishing funds as suggested.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10941	Method 3.11.4.6	AMEND Method 3.11.4.6 to add a new clause (c) to read: <u>"c. Source funding discharge reductions by way of an environmental consumptive rate based on the sensitivity of the receiving environment and degree of risk within a sub-catchment rather than a general rate."</u>	Oppose	FFNZ considers that flexibility ought to be retained by WRC to assess the appropriate funding approach as opposed to locking that in through a plan change. FFNZ also considers it inappropriate to do this through a regional plan.
Buckley, Peter Ross Submitter ID: 71423	PC1-1422	Method 3.11.4.6	RETAIN Method 3.11.4.6.	Support	FFNZ supports resourcing of WRC to implement PC1.
Cameron, Bruce Submitter ID: 60603	PC1-6381	Method 3.11.4.6	RETAIN Method 3.11.4.6.	Support	FFNZ supports resourcing of WRC to implement PC1.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10791	Method 3.11.4.6	RETAIN Method 3.11.4.6 as written.	Support	FFNZ supports resourcing of WRC to implement PC1.
Department of Conservation Submitter ID: 71759	PC1-10763	Method 3.11.4.6	RETAIN Method 3.11.4.6 as notified.	Support	FFNZ supports resourcing of WRC to implement PC1.
Hamilton City Council Submitter ID:	PC1-11040	Method 3.11.4.6	AMEND Method 3.11.4.6 as follows: <u>"c. When the relevant funding for implementation has been secured</u>	Support in part	FFNZ considers that WRC should work with all stakeholders and implement all of the methods, not just those relating to sub-catchments.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
74051			<u>through the processes listed in a and b above, or by some other means, implement Chapter 3.11 and work with relevant territorial authorities and stakeholders to implement measures identified in sub-catchment scale plans."</u>		
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10109	Method 3.11.4.6	RETAIN Method 3.11.4.6.	Support	FFNZ supports resourcing of WRC to implement PC1.
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4457	Method 3.11.4.6	AMEND PPC1 to protect remaining wetlands and gully seeps and create new incentives to encourage the creation or reinstatement of wetland areas AND RETAIN PPC1 in its entirety AND establish an appropriate funding model to fully implement the requirements of PPC1 setting out the appropriate and equitable apportionment of all on-farm implementation costs between central government, the Waikato Regional Council, landowners and any other relevant party such that each approved Farm Environment Plan sets out the cost, cost sharing arrangement and available grant assistance for all on-farm work required to comply with the requirements of each Farm Environment Plan.	Oppose in part	FFNZ does not support a blanket approach to protecting all wetlands and gullies for reasons including that it is likely to impose significant cost for no net benefit. FFNZ instead supports a tailored and proportionate approach that considers critical source areas, sub-catchment characteristics and the resources reasonably available. FFNZ does not support a regulatory requirement for sub-catchment plans. FFNZ considers this ought to be determined by the appropriate sub-catchment. FFNZ supports the establishment of appropriate funding provided it is shared with all contributors (e.g. point and diffuse), recognises natural sources of contaminants and public funding is provided for public benefit.
Maniapoto Maori Trust Board	PC1-9319	Method 3.11.4.6	RETAIN Method 3.11.4.6.	Support	FFNZ supports resourcing of WRC to implement PC1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73730					
Matamata-Piako District Council Submitter ID: 73419	PC1-3517	Method 3.11.4.6	ADD two new clauses to Method 3.11.4.6 as follows: " <u>c. Work with territorial authorities to examine options for and to implement contaminant reduction measures associated with point source discharge consents for infrastructure services that are affordable to local communities.</u> <u>d. Provide financial support for the reviews of District Plans that aim to achieve the alignment of district and regional planning provisions that give effect to the Vision and Strategy.</u> "	Support in part	FFNZ considers that all discharges, including point source, ought to be considered and affordable solutions for all (not just point source discharges) found. FFNZ considers that financial support for district plan reviews ought to be considered and weighed with other competing priorities for the use of the funding.
Miraka Limited Submitter ID: 73492	PC1-8862	Method 3.11.4.6	RETAIN Method 3.11.4.6.	Support	FFNZ supports resourcing of WRC to implement PC1.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11850	Method 3.11.4.6	RETAIN Method 3.11.4.6.	Support	FFNZ supports resourcing of WRC to implement PC1.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10591	Method 3.11.4.6	RETAIN Method 3.11.4.6.	Support	FFNZ supports resourcing of WRC to implement PC1.
Ravensdown Limited Submitter ID: 74058	PC1-10129	Method 3.11.4.6	RETAIN the intent of Method 3.11.4.6 as it is currently written.	Support	FFNZ supports resourcing of WRC to implement PC1.
Rotorua Lakes Council Submitter ID:	PC1-2516	Method 3.11.4.6	AMEND Method 3.11.4.6 to read: " <u>c. Provide sufficient staff and financial resources to work with local</u>	Support in part	FFNZ agrees that WRC should work with territorial authorities to ensure appropriate information dissemination.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
73373			<p><u>authorities within the catchments to ensure consistent and coordinated information and implementation is available to landowners and community engagement is undertaken to ensure the purposes are well understood by the community.</u></p> <p><u>d. Investigate methods of providing PPC1 information on LIM reports.</u></p> <p><u>e. Work with local authorities and stakeholders within the catchments to prioritise, develop and implement sub-catchment plans."</u></p> <p>AND MAKE any consequential amendments.</p>		<p>FFNZ considers that provision of information should not curtail territorial authority discretion as to the content of LIM reports.</p> <p>FFNZ agrees that actions ought to be prioritised but that there should not a regulatory requirement to implement catchment plans.</p>
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5741	Method 3.11.4.6	RETAIN Method 3.11.4.6 but ensure there is some measure of accountability and sanction for poor performance.	Support in part	FFNZ supports Method 6 but does not support a sanctions approach which would result in a regulatory approach to sub-catchment plans. FFNZ considers they ought to be non-regulatory, flexible and tailored.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11122	Method 3.11.4.6	AMEND Method 3.11.4.6 to include reference to Waikato Regional Council providing a fund to assist land owners, including financial incentives to re-purpose or retire land.	Support	FFNZ supports a range of funding options to assist with mitigations including WRC establishing funds as suggested.
South Waikato District Council Submitter ID: 72892	PC1-4104	Method 3.11.4.6	ADD a NEW clause to Method 3.11.4.6 to read: " <u>c. Work with territorial authorities to examine options for and to implement contaminant reduction measures associated with point source discharge consents for infrastructure</u>	Support in part	<p>FFNZ considers that all discharges, including point source, ought to be considered and affordable solutions for all (not just point source discharges) found.</p> <p>FFNZ considers that financial support for district plan reviews ought to be considered and weighed</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>services that are affordable to local communities."</u> AND ADD a NEW clause to Method 3.11.4.6 to read: " <u>d. Provide financial support for the reviews of District Plans that aim to achieve the alignment of district and regional planning provisions that give effect to the Vision and Strategy."</u>		with other competing priorities for the use of the funding.
Taupo District Council Submitter ID: 74207	PC1-8126	Method 3.11.4.6	RETAIN Method 3.11.4.6.	Support	FFNZ supports resourcing of WRC to implement PC1.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8398	Method 3.11.4.6	AMEND Method 3.11.4.6 to include further detail on priorities for council resourcing of implementation.	Oppose	FFNZ considers that Council needs to retain discretion over priorities and it is not appropriate to curtail this through a regional plan.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10416	Method 3.11.4.6	RETAIN Method 3.11.4.6.	Support	FFNZ supports resourcing of WRC to implement PC1.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3419	Method 3.11.4.6	RETAIN Method 3.11.4.6.	Support	FFNZ supports resourcing of WRC to implement PC1.
Waipa District Council Submitter ID: 67704	PC1-3165	Method 3.11.4.6	ADD the following to Method 3.11.4.6: " <u>c. Provide sufficient staff and financial resources to work with territorial authorities within the catchments to ensure consistent and</u>	Support in part	FFNZ considers that all discharges, including point source, ought to be considered and affordable solutions for all (not just point source discharges) found. FFNZ considers that financial support for district

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>coordinated information and implementation is available to landowners and community engagement is undertaken to ensure the purposes are well understood by the community.</u> <u>d. Investigate methods of providing PPC1 information on LIM reports."</u>		plan reviews ought to be considered and weighed with other competing priorities for the use of the funding.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11363	Method 3.11.4.6	RETAIN Method 3.11.4.6 as notified or amended by similar wording to like effect.	Support	FFNZ supports resourcing of WRC to implement PC1.
Waitomo District Council Submitter ID: 73688	PC1-10324	Method 3.11.4.6	ADD to Method 3.11.4.6 the following clauses to read: " <u>...c. Provide sufficient staff and financial resources to work with local authorities within the catchments to ensure consistent and coordinated information and implementation is available to landowners and that community engagement is undertaken to ensure the purposes are well understood by the community.</u> <u>d. Investigate methods of providing PPC1 information on LIM reports.</u> <u>e. Work with local authorities and stakeholders within the catchments to prioritise, develop and implement sub-catchment plans."</u>	Support in part	FFNZ agrees that WRC should work with territorial authorities to ensure appropriate information dissemination. FFNZ considers that provision of information should not curtail territorial authority discretion as to the content of LIM reports. FFNZ agrees that actions ought to be prioritised but that there should not a regulatory requirement to implement catchment plans.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game	PC1-10959	Method 3.11.4.7	AMEND Method 3.11.4.7 to read: "3.11.4.7 Information needs to support any <u>current and future allocation.</u>	Oppose	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74085			Gather information and commission appropriate scientific research to inform any <u>current and</u> future framework for the allocation of diffuse discharge including: a. Implementing processes that will support the <u>revision</u> and setting of property or enterprise-level diffuse discharge limits <u>now and</u> in the future to support sub-catchment reviews..."		considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11498	Method 3.11.4.7	AMEND Method 3.11.4.7 to empower an approach to managing nutrient discharges, and in particular Nitrogen discharges at a sub-catchment level, AND in accordance with amendments sort on the Objectives, Policies and Methods contained within the submission.	Oppose	While FFNZ supports a sub-catchment approach and tailoring FEPs to particular sub-catchments (particularly through catchment profiles established through FFNZ's submission on Variation 1 in respect of a new Method 5A), FFNZ does not support allocation of contaminant loads at a sub-catchment level for reasons including that it does not support allocation and is concerned about the potentially significant costs for no net benefits. While FFNZ supports non-regulatory sub-catchment planning and groups, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.
Cameron, Bruce Submitter ID: 60603	PC1-6382	Method 3.11.4.7	RETAIN the 'gaining data' section of Method 3.11.4.7. AND AMEND PPC1 to enable the management of diffuse discharges on a sub-catchment basis.	Support in part Oppose in part	FFNZ agrees that data ought to be gathered, science developed and the catchment better understood. FFNZ also supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.
Charion Investment	PC1-7771	Method 3.11.4.7	AMEND Method 3.11.4.7 to	Oppose	FFNZ does not support allocation of contaminants

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Trust Submitter ID: 71344			read: "Gather information and commission appropriate scientific research to inform any future framework for the allocation of diffuse discharges including: a. Implementing processes that will support the setting of <u>sub-catchment or, where necessary, individual</u> property or enterprise-level diffuse discharge limits in the future. b. Researching: i. The quantum of contaminants that can be discharged at a sub-catchment and Freshwater Management Unit scale while meeting the Table 3.11-1 water quality attribute targets. ii. Methods to categorise and define 'land suitability'. iii. Tools for measuring or modelling discharges from <u>sub-catchment or, where necessary, individual</u> properties, enterprises and sub-catchments, and how this can be related to the Table 3.11-1 water quality attribute targets."		for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support allocation at a sub-catchment or property level limits or for modelling discharges from individual properties for allocation purposes for reasons including that there is no reliable or equitable basis for doing so and it will likely impose significant cost for no net benefit.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10793	Method 3.11.4.7	AMEND Method 3.11.4.7 to read: "Gather information and commission appropriate scientific research to inform any future <u>regulations to manage discharges to target high polluting activities framework for the allocation of diffuse discharges by 2026 including:</u> "	Support in part Oppose in part	FFNZ supports a prioritised approach that targets hot spots. However, it considers this ought to happen on a sub-catchment basis through non regulatory plans and through tailored FEPs that look at critical source areas using FFNZ's MPA approach (see FFNZ's submission on Variation 1). FFNZ agrees that discharges ought to be managed but does not support allocation.
DairyNZ	PC1-10240	Method 3.11.4.7	AMEND Method 3.11.4.7 to read:	Oppose in	FFNZ considers the focus of Method 7 ought to be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74050			<p>"3.11.4.7 Information requirements to determine the need for <u>property-level limits on diffuse discharges and any future allocation/...</u> <u>Waikato Regional Council will take a broad-based and integrated approach to assessing existing information and new information gathered through PPC1. It will do this in partnership with other agencies and industries, commissioning research on the effects of property-level limits on waterbodies, and implications for individuals and communities. Gather information and commission appropriate scientific research to inform any future framework for the allocation of diffuse discharges including:</u></p> <p>a. Implementing processes that will support the setting of property or enterprise-level diffuse discharge limits in the future. b. Researching: i. The quantum of contaminants that can be discharged... ... iv. <u>Spatial variability in how land use and mitigations, and the effect of impounded water in hydro-dams affect water quality at a variety of scales, to analyse where mitigations can be put in place for the least cost to the regional community."</u></p>	part	<p>on management of discharges and not allocation. FFNZ does not support allocation for reasons including there is no reliable or equitable basis to allocate and it is likely to impose significant cost for no net benefit.</p> <p>FFNZ agrees that WRC needs to consider all information and involve the community. But this should not be with a view to considering property level limits for reasons including that it is premature to allocate or to determine an allocation approach or to determine the matters that ought to be researched.</p> <p>FFNZ supports gathering more information about the effects of hydro dams on water quality.</p>
Fertiliser	PC1-9835	Method 3.11.4.7	AMEND Method 3.11.4.7 to read:	Support in	FFNZ agrees the focus ought to be on discharges to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Association of New Zealand Submitter ID: 73305			"Gather information and commission appropriate scientific research to inform any future framework for the allocation of diffuse discharges including: a. Implementing processes that will support the setting of property or enterprise-level <u>limits in the future for diffuse discharge to water limits in the future.</u> b. Researching: i. The quantum of contaminants that can be <u>lost to water discharged</u> at a sub-catchment and Freshwater Management Unit scale while meeting the Table 3.11-1 water quality attribute targets. ... iii. Tools for measuring or modelling discharges <u>to water</u> from individual properties, enterprises and sub-catchments and how this can be related to Table 3.11-1 water quality attribute targets."	part Oppose in part	water (as opposed to what leaves the root zone, for example). FFNZ does not support allocation and considers that it is premature to allocate or to determine an allocation approach or to determine the matters that ought to be researched.
Fulton Hogan Limited Submitter ID: 74048	PC1-10870	Method 3.11.4.7	AMEND Method 3.11.4.7(b)(i) to read: "...Freshwater Management Unit scale while meeting <u>Objective 1 the Table 3.11-1 water quality attribute targets.</u> " AND AMEND Method 3.11.4.7(b)(iii) to read: "...and how this can be related to <u>Objective 1 the Table 3.11-1 water quality attribute targets.</u> "	Support in part	FFNZ would support the reference to Objective 1 if it was amended as set out in FFNZ's submission on Variation 1 for reasons including that FFNZ does not support 80 year targets.
GBC Winstone Submitter ID:	PC1-3613	Method 3.11.4.7	AMEND Method 3.11.4.7 b. as follows: "i. The quantum of	Support in part	FFNZ would support the reference to Objective 1 if it was amended as set out in FFNZ's submission on

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
73992			contaminants... scale while meeting <u>Objective 1 the Table 3.11-1 water quality attribute targets</u> ." AND AMEND method 3.11.4.7 b. as follows: "iii. Tools for measuring or...can be related to <u>Objective 1 the Table 3.11-1 water quality attribute targets</u> ."		Variation 1 for reasons including that FFNZ does not support 80 year targets.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10110	Method 3.11.4.7	AMEND Method 3.11.4.7 to read: "a. Implementing processes that will support the setting of property or enterprise-level diffuse discharge limits in the future. b. Researching <u>and making publicly available</u> : i. The quantum of contaminants that can be discharged at a sub-catchment and Freshwater Management Unit scale while meeting the Table 3.11-1 water quality attribute targets <u>and/or sub-catchment load targets identified Schedule 1C Table XX</u> . ii. Methods to categorise and define 'land suitability'. iii. Tools for measuring or modelling discharges from individual properties, enterprises and sub-catchments, and how this can be related to the Table 3.11-1 water quality attribute targets <u>and/or sub-catchment load targets identified Schedule 1C Table XX</u> . c. Prior to Jan 2019, by working with the Foundation of Arable Research, Horticulture New Zealand and The	Support in part Oppose in part	FFNZ agrees that any research ought to be publicly available. FFNZ does not support to allocating contaminants or loads to a property or sub-catchment level and does not support the load targets proposed by this submitter. In principle, FFNZ would support a reasonable proxy for an NRP for commercial vegetable growing and for crop rotation but considers that a better approach is to consider separate discharge consents as set out in FFNZ's submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>Pukekohe Vegetable Growers Association to develop a proxy nitrogen reference point for enterprises managing multiple properties and crops using a model or method approved by the Chief Executive of Waikato Regional Council.</u> "		
Lakes and Waterways Action Group Trust (LWAG) Submitter ID: 53342	PC1-4072	Method 3.11.4.7	AMEND Method 3.11.4.7 so that water quality is not managed at a lower level than current water quality and must seek an improvement.	Oppose	FFNZ considers that the obligation in the NPS-FM is to maintain within an band or improve and does not support a requirement that all water quality attributes everywhere must be improved.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-10013	Method 3.11.4.7	RETAIN Method 3.11.4.7.	Oppose in part	FFNZ considers that Method 7 requires significant amendment to address matters such as gathering robust evidence on water quality issues and potential mitigations, working with the community and no allocating or pre-determining or signally an allocation approach at either a property or sub-catchment scale.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-12309	Method 3.11.4.7	AMEND Method 3.11.4.7 to read: "Gather information and commission... any future framework for the allocation of diffuse discharges <u>by 2026</u> including: a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits in the future ... iv. <u>Detailed evaluation of the range of options (including economic instruments) that are available to allocate rights to discharge contaminants from land use.</u> "	Oppose	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Mercury NZ Limited Submitter ID: 73182	PC1-9592	Method 3.11.4.7	AMEND Method 3.11.4.7 to read: "3.11.4.7 Information needs to support any future allocation... <u>Waikato Regional Council will</u> gather information and commission appropriate scientific research to inform any future framework for the allocation of diffuse discharges including:..."	Support in part	FFNZ supports clarifying that WRC will gather information but considers that Method 7 requires significant amendment to address matters such as gathering robust evidence on water quality issues and potential mitigations, working with the community and no allocating or pre-determining or signally an allocation approach at either a property or sub-catchment scale.
Miraka Limited Submitter ID: 73492	PC1-8870	Method 3.11.4.7	AMEND Method 3.11.4.7(b)i to read as follows: "The quantum of contaminants that can be discharged at a sub-catchment and <u>or</u> Freshwater Management Unit scale while meeting the Table 3.11-1 water quality attribute targets." AND AMEND Method 3.11.4.7(b)ii to read as follows : "Methods to categorise and define 'land suitability', <u>as one potential allocation framework</u> " AND ADD an Implementation Method 3.11.4.7(c) to read as follows: <u>"Disseminating the information and research results in such a way as to inform the public and facilitate Schedule 1 processes around future allocation frameworks."</u>	Support in part Oppose in part	While FFNZ agrees that the option to consider contaminant discharge at an FMU or sub-catchment scale ought to be provided it considers that Method 7 requires significant amendment to address matters such as gathering robust evidence on water quality issues and potential mitigations, working with the community and no allocating or pre-determining or signally an allocation approach at either a property or sub-catchment scale.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4630	Method 3.11.4.7	RETAIN Method 3.11.4.7.	Oppose	FFNZ considers that Method 7 requires significant amendment to address matters such as gathering robust evidence on water quality issues and potential mitigations, working with the community and no allocating or pre-determining or signally an allocation approach at either a property or sub-catchment scale.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
New Zealand Steel Ltd Submitter ID: 73790	PC1-3733	Method 3.11.4.7	RETAIN Method 3.11.4.7.	Oppose	FFNZ considers that Method 7 requires significant amendment to address matters such as gathering robust evidence on water quality issues and potential mitigations, working with the community and no allocating or pre-determining or signally an allocation approach at either a property or sub-catchment scale.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11851	Method 3.11.4.7	AMEND Method 3.11.4.7 to read: "Gather information and commission... any future framework for the allocation of diffuse discharges by 2026 including: a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits in the future ... iv. Detailed evaluation of the range of options (including economic instruments) that are available to allocate rights to discharge contaminants from land use."	Oppose	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-6941	Method 3.11.4.7	AMEND Method 3.11.4.7 first sentence to read: "...Gather information and commission appropriate scientific research to inform mitigation strategies to manage any future framework for the allocation of diffuse discharges:..." AND AMEND to make other changes appropriate to reflect the reasons for the submission and/ or the alternative approach proposed in the submission.	Support in part Oppose in part	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen. Therefore, FFNZ supports focusing on management of discharges as opposed to allocation.
Raukawa	PC1-10565	Method 3.11.4.7	AMEND Method 3.11.4.7 to read:	Oppose	FFNZ does not support allocation of contaminants

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Charitable Trust Submitter ID: 74073			"Gather information and commission... any future framework for the allocation of diffuse discharges <u>by 2026</u> including: a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits in the future ... iv. <u>Detailed evaluation of the range of options (including economic instruments) that are available to allocate rights to discharge contaminants from land use.</u> "		for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen.
Ravensdown Limited Submitter ID: 74058	PC1-10130	Method 3.11.4.7	RETAIN the intent of Method 3.11.4.7 as it is currently written.	Oppose in part	FFNZ considers that Method 7 requires significant amendment to address matters such as gathering robust evidence on water quality issues and potential mitigations, working with the community and no allocating or pre-determining or signally an allocation approach at either a property or sub-catchment scale.
Taupo District Council Submitter ID: 74207	PC1-8127	Method 3.11.4.7	RETAIN the intent of Method 3.11.4.7.	Oppose in part	FFNZ considers that Method 7 requires significant amendment to address matters such as gathering robust evidence on water quality issues and potential mitigations, working with the community and no allocating or pre-determining or signally an allocation approach at either a property or sub-catchment scale.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11800	Method 3.11.4.7	AMEND Method 3.11.4.7 to read: "Gather information and commission... any future framework for the allocation of diffuse discharges <u>by 2026</u> including: a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits in the	Oppose	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			future ... iv. Detailed evaluation of the range of options (including economic instruments) that are available to allocate rights to discharge contaminants from land use."		
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8399	Method 3.11.4.7	RETAIN Method 3.11.4.7.	Oppose	FFNZ considers that Method 7 requires significant amendment to address matters such as gathering robust evidence on water quality issues and potential mitigations, working with the community and no allocating or pre-determining or signally an allocation approach at either a property or sub-catchment scale.
Timberlands Limited Submitter ID: 73036	PC1-3416	Method 3.11.4.7	AMEND Method 3.11.4.7 to read: "Gather information and commission appropriate scientific research to inform any future <u>regulations to manage discharges to target high polluting activities</u> framework for the allocation of diffuse discharges by 2026 including:"	Support in part Oppose in part	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen. Therefore, FFNZ supports focusing on management of discharges as opposed to allocation but considers it ought to be on a sub-catchment hot spot approach as opposed to focusing on individual discharges from a property level.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10426	Method 3.11.4.7	AMEND Method 3.11.4.7 to read: "Gather information and commission... any future framework for the allocation of diffuse discharges by 2026 including: a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits in the future ...	Oppose	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>iv. Detailed evaluation of the range of options (including economic instruments) that are available to allocate rights to discharge contaminants from land use."</u>		
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3421	Method 3.11.4.7	AMEND Method 3.11.4.7 to read: "Gather information and commission... any future framework for the allocation of diffuse discharges by 2026 including: a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits in the future ... <u>iv. Detailed evaluation of the range of options (including economic instruments) that are available to allocate rights to discharge contaminants from land use."</u>	Oppose	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen.
Waikato Dairy Leaders Group Submitter ID: 74049	PC1-11009	Method 3.11.4.7	AMEND Method 3.11.4.7 to set out a programme of work to provide an accurate assessment of all sources that contribute to the load of contaminant from the land and to track changes in diffuse and point source discharges as a result of actions required by PPC1.	Support in part Oppose in part	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen. Therefore, FFNZ supports focusing on management of discharges and all sources as opposed to allocation but considers it ought to be on a sub-catchment hot spot approach as opposed to focusing on individual discharges from a property level.
Wairakei Pastoral Ltd	PC1-11364	Method 3.11.4.7	AMEND Method 3.11.4.7 to read: "3.11.4.7 <u>Adopting an adaptive</u>	Oppose in part	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74095			<u>management and mitigation approach for sub-catchments for</u> Information needs to support any future allocation of <u>diffuse discharges</u> Gather information and commission appropriate scientific research to inform <u>the development and implementation of any future a</u> framework for the allocation of diffuse discharges including: a. Implementing processes that will support the <u>development of an adaptive management and mitigation approach</u> for the setting of property or enterprise-level diffuse discharge limits in the future <u>each sub-catchment."</u>		equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen. In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2126	Method 3.11.4.7	DELETE the reference to land suitability in Method 3.11.4.7 AND AMEND to include a clause 'vi' under (b) that reads as follows: <u>"Gather information and fully investigate the effects the hydro system has on water quality and water monitoring readings [to better under] in order to decide future allocations."</u>	Support in part	FFNZ considers that Method 7 requires significant amendment to address matters such as gathering robust evidence on water quality issues and potential mitigations, working with the community and no allocating or pre-determining or signally an allocation approach at either a property or sub-catchment scale. FFNZ supports amendments to focus on gathering information and considers that the effects of hydro dams ought to be investigated.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10962	Method 3.11.4.8	AMEND Method 3.11.4.8 as follows: "3.11.4.8 Reviewing Chapter 3.11 and refining and developing an allocation framework for the next Regional Plan Waikato Regional Council will:	Oppose	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			a. <u>Refine and review discharge and allocation frameworks as part of the rolling review of sub-catchment performance</u> Develop discharge allocation frameworks for individual properties and enterprises based on information collected under Method 3.11.4.7, taking into account the best available data, knowledge and technology at the time; and..."		happen.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11499	Method 3.11.4.8	AMEND Method 3.11.4.8 to introduce thresholds for the management of contaminants and in particular Nitrogen, that meet the changes sought in this submission, AND that are based on better linking sub-catchment contaminant loads to priority actions through resource consents and Farm Environment Plans.	Oppose	FFNZ does not support thresholds for contaminants for reasons including that this is effectively allocation and FFNZ does not support allocation. FFNZ does not support linking contaminant loads with FEPs because this is akin to allocation to a property level. FFNZ prefers a proportionate and tailored FEP approach using catchment profiles and the MPA framework proposed in FFNZ's submission on Variation 1.
Cameron, Bruce Submitter ID: 60603	PC1-6383	Method 3.11.4.8	RETAIN the 'gaining data' section of Method 3.11.4.8. AND AMEND PPC1 to enable the management of diffuse discharges on a sub-catchment basis.	Support in part Oppose in part	FFNZ agrees that data ought to be gathered, science developed and the catchment better understood. FFNZ also supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10794	Method 3.11.4.8	AMEND Method 3.11.4.8 to read: "Waikato Regional Council will <u>use</u> : a. Develop discharge allocation frameworks for individual properties and enterprises based on information	Support in part	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			collected under Method 3.11.4.7, taking into account the best available data, knowledge and technology at the time; and b. Use this on Information collected under Method 3.11.4.7 to inform future changes to the Waikato Regional Plan to manage discharges of nitrogen, phosphorus, sediment and microbial pathogens at a property or enterprise-level to meet the targets^ in the Objectives."		plan change it is necessary or to signal how it would happen. FFNZ supports amendments to remove allocation and to support gathering information.
DairyNZ Submitter ID: 74050	PC1-10241	Method 3.11.4.8	AMEND Method 3.11.4.8 to read: "3.11.4.8 Reviewing Chapter 3.11 and developing <u>options an allocation framework</u> for the next Regional Plan/..." AND AMEND 8a. to read: "Waikato Regional Council will: a. Develop <u>options to reduce discharges allocation frameworks for from</u> individual properties and..."	Support in part Oppose in part	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation at a property or sub-catchment level and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen. FFNZ supports amendments to remove allocation and to support gathering information and exploring options.
Department of Conservation Submitter ID: 71759	PC1-10765	Method 3.11.4.8	AMEND Method 3.11.4.8 to see the immediate introduction of an allocation regime that considers land type and can be amended as further information becomes available.	Oppose	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation and doing so will impose significant cost for no net benefit. FFNZ does not support the current or future allocation at a property or sub-catchment level and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen.
Fertiliser Association of New Zealand Submitter ID:	PC1-9839	Method 3.11.4.8	AMEND Method 3.11.4.8 to read: "Waikato Regional Council will: a. Review information gathered under <u>Method 3.11.4.7 and factors arising</u>	Support in part Oppose in	FFNZ supports clarifying that it is discharges to water (as opposed to discharges leaving the root zone for example).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
73305			during implementation of Chapter 3.11 a-b. Develop discharge allocation frameworks for discharge to water for individual properties and enterprises based on information collected under Method 3.11.4.7, taking into account the best available data, knowledge and technology at the time; and b-c. Use this to inform future changes to the Waikato Regional Plan to manage discharges to water of nitrogen, phosphorus, sediment and microbial pathogens at a property or enterprise-level to meet the targets in the objectives."	part	However, FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation at a property or sub-catchment level and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen.
Fulton Hogan Limited Submitter ID: 74048	PC1-10871	Method 3.11.4.8	AMEND Method 3.11.4.8(b) to read: "...at a property or enterprise-level to meet the targets in the Objectives".	Support in part	FFNZ supports removing "targets" for reasons including that FFNZ considers the 80 year targets are flawed. However, FFNZ considers further amendments are needed including to remove references to allocation and refers to FFNZ's submission on Variation 1.
GBC Winstone Submitter ID: 73992	PC1-3615	Method 3.11.4.8	AMEND Method 3.11.4.8 b. as follows: "Use this to inform... enterprise-level to meet the targets in the Objectives."	Support in part	FFNZ supports removing "targets" for reasons including that FFNZ considers the 80 year targets are flawed. However, FFNZ considers further amendments are needed including to remove references to allocation and refers to FFNZ's submission on Variation 1.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5764	Method 3.11.4.8	REPLACE Method 3.11.4.8 with the implementation of actions within the life of PPC1.	Oppose in part	FFNZ is not sure what is meant about implementation of actions within the lifetime of PC1. It is concerned that this will impose significant cost for no net benefit if it meant something like requiring FEP actions to be implemented in the lifetime of PC1. However, if it meant that only reasonable actions were implemented and that references to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					allocation were deleted FFNZ might support in principle but considers amendment is needed to provide for information gathering.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10111	Method 3.11.4.8	RETAIN Method 3.11.4.8.	Oppose	FFNZ considers that significant amendment is required, including to remove references to allocation and to provide for information gathering and working with the community. FFNZ refers further to its submission on Variation 1.
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-10014	Method 3.11.4.8	RETAIN Method 3.11.4.8.	Oppose	FFNZ considers that significant amendment is required, including to remove references to allocation and to provide for information gathering and working with the community. FFNZ refers further to its submission on Variation 1.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9323	Method 3.11.4.8	AMEND Method 3.11.4.8 to read: "...b. Use this to inform future <u>the best available information to develop changes to the Waikato Regional Plan by 2026</u> to manage discharges..."	Support in part Oppose in part	In principle, FFNZ supports gathering information and using the best information available or reasonably obtainable or identifying work to be researched. However, FFNZ considers that significant amendment is required, including to remove references to allocation and to provide for information gathering and working with the community. FFNZ refers further to its submission on Variation 1.
Miraka Limited Submitter ID: 73492	PC1-8882	Method 3.11.4.8	RETAIN Method 3.11.4.8.	Oppose	FFNZ considers that significant amendment is required, including to remove references to allocation and to provide for information gathering and working with the community. FFNZ refers further to its submission on Variation 1.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4631	Method 3.11.4.8	RETAIN Method 3.11.4.8.	Oppose	FFNZ considers that significant amendment is required, including to remove references to allocation and to provide for information gathering and working with the community. FFNZ refers further to its submission on Variation 1.
New Zealand Steel Ltd	PC1-3735	Method 3.11.4.8	RETAIN Method 3.11.4.8.	Oppose	FFNZ considers that significant amendment is required, including to remove references to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73790					allocation and to provide for information gathering and working with the community. FFNZ refers further to its submission on Variation 1.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11852	Method 3.11.4.8	AMEND Method 3.11.4.8 to read: "...b. Use this to inform future <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."	Support in part Oppose in part	In principle, FFNZ supports gathering information and using the best information available or reasonably obtainable or identifying work to be researched. However, FFNZ considers that significant amendment is required, including to remove references to allocation and to provide for information gathering and working with the community. FFNZ refers further to its submission on Variation 1.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-7698	Method 3.11.4.8	DELETE Method 3.11.4.8.	Support in part	FFNZ agrees that Method 8 ought to be deleted due to its reference to allocation. However, it considers that this or another method ought to provide for information gathering and working with the community. FFNZ refers further to its submission on Variation 1.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10588	Method 3.11.4.8	AMEND Method 3.11.4.8 to read: "...b. Use this to inform future <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."	Support in part Oppose in part	In principle, FFNZ supports gathering information and using the best information available or reasonably obtainable or identifying work to be researched. However, FFNZ considers that significant amendment is required, including to remove references to allocation and to provide for information gathering and working with the community. FFNZ refers further to its submission on Variation 1.
Taupo District Council Submitter ID: 74207	PC1-8128	Method 3.11.4.8	AMEND Method 3.11.4.8 to develop an allocation framework that rewards changes in land use management that have resulted in reduced diffuse discharges AND ENSURE that Taupo District Council is involved in the development of the allocation	Oppose	In principle, FFNZ supports the use of funding and incentives but FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the current or future allocation and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			framework.		FFNZ supports amendments to remove allocation and to support gathering information.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11801	Method 3.11.4.8	AMEND Method 3.11.4.8 to read: "...b. Use this to inform future <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."	Support in part Oppose in part	In principle, FFNZ supports gathering information and using the best information available or reasonably obtainable or identifying work to be researched. However, FFNZ considers that significant amendment is required, including to remove references to allocation and to provide for information gathering and working with the community. FFNZ refers further to its submission on Variation 1.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10436	Method 3.11.4.8	AMEND Method 3.11.4.8 to read: "...b. Use this to inform future <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."	Support in part Oppose in part	In principle, FFNZ supports gathering information and using the best information available or reasonably obtainable or identifying work to be researched. However, FFNZ considers that significant amendment is required, including to remove references to allocation and to provide for information gathering and working with the community. FFNZ refers further to its submission on Variation 1.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3423	Method 3.11.4.8	AMEND Method 3.11.4.8 to read: "...b. Use this to inform future <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."	Support in part Oppose in part	In principle, FFNZ supports gathering information and using the best information available or reasonably obtainable or identifying work to be researched. However, FFNZ considers that significant amendment is required, including to remove references to allocation and to provide for information gathering and working with the community. FFNZ refers further to its submission on Variation 1.
Waikato Dairy Leaders Group Submitter ID: 74049	PC1-11010	Method 3.11.4.8	AMEND Method 3.11.4.8 to set out a programme of work to provide an accurate assessment of all sources that contribute to the load of contaminant from the land and to	Oppose in part	FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support current or future allocation and considers it is not appropriate to conclude in this plan change it

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			track changes in diffuse and point source discharges as a result of actions required by PPC1 AND AMEND to require an analysis of frameworks to manage both point source and diffuse discharges of contaminants.		<p>is necessary or to signal how it would happen.</p> <p>FFNZ does not support amendments to attempt to calculate and identify precise discharges for reasons including that there is no reliable way of doing this and such an approach is likely to lead to property level allocation.</p> <p>FFNZ supports amendments to remove allocation and to support gathering information, sub-catchment forensics and more robust science.</p> <p>FFNZ supports management frameworks provided they are not based on allocation.</p>
Waikato Regional Council Submitter ID: 72890	PC1-3111	Method 3.11.4.8	AMEND Method 3.11.4.8 (b) to read: "Use this to inform future changes... to meet the <u>water quality attribute</u> ^ targets^ in <u>Table 3.11-1</u> the Objectives"	Oppose in part	FFNZ does not support the 80 year targets for reasons including that they are based on flawed assumptions. FFNZ considers that the method ought to refer to the objectives as amended in FFNZ's submission on Variation 1 or Table 3.11-1 ought to be amended to delete the 80 year targets.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11365	Method 3.11.4.8	AMEND Method 3.11.4.8 to read: "a...knowledge and technology at the time; and <u>b. Monitor and review any adaptive management and mitigation approach for the sub-catchment developed to determine a discharge allocation regime for the relevant sub-catchment as part of Stage 1; and</u> <u>c.b.</u> Use this to inform..."	Oppose	<p>FFNZ does not support allocation of contaminants for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support current or future allocation to a property or sub-catchment level and considers it is not appropriate to conclude in this plan change it is necessary or to signal how it would happen.</p> <p>In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available.</p>
Auckland/Waikato	PC1-10970	Method 3.11.4.9	AMEND PPC1 to ensure rules to	Support in	FFNZ agrees that urban and rural discharges (as

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Fish and Game and Eastern Region Fish and Game Submitter ID: 74085			improve water quality cover both urban and rural situations.	part	well at other causes of water quality issues e.g. pests like koi carp) ought to be considered and subject to any targets, objectives or limits. However, FFNZ recognises that there may need to be differences in approach to recognise things like differences in the discharges e.g. a point source is quantifiable, diffuse is not usually observable.
Cameron, Bruce Submitter ID: 60603	PC1-6384	Method 3.11.4.9	RETAIN Method 3.11.4.9.	Support in part	FFNZ agrees that Method 9 ought to be retained but considers that some amendments are necessary e.g. to recognise future urban development and to gather information in effects of urban development and potential mitigation options.
Charion Investment Trust Submitter ID: 71344	PC1-7778	Method 3.11.4.9	AMEND Method 3.11.4.9 to add new clause (c) to read: " <u>...c. Consider the effects of Nitrogen, Phosphorus, Sediment, and Microbial pathogens levels in water discharged from urban areas and the road and rail networks when assessing those levels in lakes, rivers and tributaries impacting on the Waikato River and the Waipā River.</u> "	Support	FFNZ supports consideration of these types of urban discharges and considers that further information ought to be gathered to better understand urban discharges and potential mitigation options.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-9842	Method 3.11.4.9	AMEND Method 3.11.4.9 to read: "b. ...with urban communities to raise awareness of water quality issues, and to identify and implement effective solutions <u>to meet the 80-year water quality attribute targets in Table 3.11-1 and the objectives of this plan, for the urban context.</u> "	Oppose in part	FFNZ does not support the 80 year targets. It considers that paragraph b ought to be amended to refer to the values and Vision & Strategy, and the 10 year targets.
Hamilton City Council Submitter ID: 74051	PC1-11041	Method 3.11.4.9	AMEND 3.11.4.9 as follows: "a. Continue to work with territorial authorities to implement the Waikato Regional Policy Statement set of principles that guide future development of the built environment	Support in part Oppose in part	FFNZ considers that any principles developed ought to be consistent with PC1 and if they deviate or change the implementation or interpretation of PC1 then that ought to be subject to a plan change process.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>which anticipates and addresses cumulative effects over the long term.</p> <p><u>aa. Recognise the principles referred to in 'a' above will create pressure for additional storm water and wastewater discharges that needs to be recognised at the time of consenting these discharges.</u></p> <p>b. When undertaking sub-catchment scale planning under Method 3.11.4.5 in urban sub-catchments <u>with urban area</u>, <u>engage with the relevant territorial authorities</u>, urban communities <u>and other stakeholders</u> to raise awareness of water quality issues, and to identify and implement <u>effective solutions for the urban context</u> <u>measures to manage the adverse effects of activities and development on</u>, and to enhance, <u>water bodies.</u></p> <p><u>c. Work with relevant territorial authorities and stakeholders to implement the measures identified in b above."</u></p>		FFNZ supports amendments that provide for further information gathering and understanding of potential mitigations.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5765	Method 3.11.4.9	RETAIN Method 3.11.4.9.	Support in part	FFNZ agrees that Method 9 ought to be retained but considers that some amendments are necessary e.g. to recognise future urban development and to gather information in effects of urban development and potential mitigation options.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10112	Method 3.11.4.9	AMEND Method 3.11.4.9 to read: "Waikato Regional Council will: a. Continue to work with territorial authorities to implement the Waikato Regional Policy Statement set of	Support in part Oppose in part	FFNZ agrees that the effect of urban activities on water quality needs to be considered but is concerned that the phrase "avoiding the degradation" is not consistent with the NPS-FM and maintain and improve within a NOF band.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>principles that guide future development of the built environment which anticipates and addresses cumulative effects over the long term <u>including avoiding the degradation of freshwater resources and discharge of contaminates from urban activities into the urban environment.</u></p> <p>b. When undertaking sub-catchment scale planning under Method 3.11.4.5 in urban sub-catchments engage with urban communities to raise awareness of water quality issues, and to identify and implement effective solutions for the urban context.</p> <p>c. <u>Assess the contribution of contaminants to waterbodies from urban areas over time to ensure that urban discharges are accounted for, to allow responsibility for managing urban discharges to be allocated.</u></p> <p>d. <u>In evaluating (c) above, publicly report the assessment of contributions and their assessed effect on values for freshwater identified in this plan change."</u></p>		<p>FFNZ supports assessing urban discharge contributions to water quality as part of sub-catchment forensics and better understanding water quality issues. However, it does not support this if it is used to support an allocation approach.</p> <p>FFNZ does not support allocation so does not support accounting for urban discharges if it is used to support allocation of contaminants at a sub-catchment or property level.</p> <p>FFNZ supports transparency and reporting but considers that issues associated with privacy and confidentiality should appropriately be provided for.</p>
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4459	Method 3.11.4.9	<p>AMEND PPC1 to protect remaining wetlands and gully seeps and create new incentives to encourage the creation or reinstatement of wetland areas</p> <p>AND RETAIN PPC1 in its entirety</p> <p>AND AMEND Section 3.11.4.9 (b) to delete "engaged with" and replace</p>	Oppose in part	FFNZ does not support a blanket approach to protecting all wetlands and gullies for reasons including that it is likely to impose significant cost for no net benefit. FFNZ instead supports a tailored and proportionate approach that considers critical source areas, sub-catchment characteristics and the resources reasonably available.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			with " <u>consulted</u> " and to broaden the term 'urban communities' to explicitly require that groups such as the Mangakotukutuku Stream Care Group be consulted with in respect to the preparation of any sub-catchment plan within the Mangakotukutuku catchment.		FFNZ agrees that all affected members of the community need to be involved in sub-catchment planning but is not sure that this amendment is necessary.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9325	Method 3.11.4.9	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment which anticipates and addresses <u>to address the cumulative effect of urban development on water quality over the long-term.</u> "	Oppose	FFNZ considers the word "anticipates" is helpful and necessary to address matters such as future urban growth and development (as opposed to solely being reactionary).
Miraka Limited Submitter ID: 73492	PC1-8885	Method 3.11.4.9	RETAIN Method 3.11.4.9.	Support in part	FFNZ agrees that Method 9 ought to be retained but considers that some amendments are necessary e.g. to recognise future urban development and to gather information in effects of urban development and potential mitigation options.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4632	Method 3.11.4.9	RETAIN Method 3.11.4.9.	Support in part	FFNZ agrees that Method 9 ought to be retained but considers that some amendments are necessary e.g. to recognise future urban development and to gather information in effects of urban development and potential mitigation options.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11853	Method 3.11.4.9	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment which anticipates and addresses <u>to address the cumulative effect of urban development on water quality over the long-term.</u> "	Oppose	FFNZ considers the word "anticipates" is helpful and necessary to address matters such as future urban growth and development (as opposed to solely being reactionary).
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-7699	Method 3.11.4.9	RETAIN Method 3.11.4.9.	Support in part	FFNZ agrees that Method 9 ought to be retained but considers that some amendments are necessary e.g. to recognise future urban development and to gather information in effects of urban development

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					and potential mitigation options.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10566	Method 3.11.4.9	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment which anticipates and addresses to address the cumulative effect of urban development on water quality over the long-term. "	Oppose	FFNZ considers the word "anticipates" is helpful and necessary to address matters such as future urban growth and development (as opposed to solely being reactionary).
Rotorua Lakes Council Submitter ID: 73373	PC1-2518	Method 3.11.4.9	AMEND Method 3.11.4.9 to read: " <u>a. Continue to work with territorial authorities to implement the Waikato Regional Policy Statement set of principles and territorial authority spatial plans that guide future development of the built environment which anticipates and addresses cumulative effects over the long term.</u> <u>This work should also recognise the ability of urban development in certain circumstances to result in a net overall improvement in contaminant load, and or profile.</u> " AND MAKE any consequential amendments.	Support in part	FFNZ considers that some amendments to Method 4 are necessary e.g. to recognise future urban development and to gather information in effects of urban development and potential mitigation options. FFNZ considers that all affected members of the community ought to be involved in the development of solutions. FFNZ agrees that the overall effect of urban development ought to be taken into account.
Taupo District Council Submitter ID: 74207	PC1-8146	Method 3.11.4.9	RETAIN the intent of Method 3.11.4.9. AND ENSURE Taupo District Council is involved in the development of solutions to manage the effects of urban development.	Support in part	FFNZ agrees that Method 9 ought to be retained but considers that some amendments are necessary e.g. to recognise future urban development and to gather information in effects of urban development and potential mitigation options. FFNZ considers that all affected members of the community ought to be involved in the development of solutions.
Te Arawa River Iwi Trust	PC1-11802	Method 3.11.4.9	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built	Oppose	FFNZ considers the word "anticipates" is helpful and necessary to address matters such as future urban

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73697			environment which anticipates and addresses to address the cumulative effect of urban development on water quality over the long-term."		growth and development (as opposed to solely being reactionary).
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10442	Method 3.11.4.9	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment which anticipates and addresses to address the cumulative effect of urban development on water quality over the long-term."	Oppose	FFNZ considers the word "anticipates" is helpful and necessary to address matters such as future urban growth and development (as opposed to solely being reactionary).
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3424	Method 3.11.4.9	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment which anticipates and addresses to address the cumulative effect of urban development on water quality over the long-term."	Oppose	FFNZ considers the word "anticipates" is helpful and necessary to address matters such as future urban growth and development (as opposed to solely being reactionary).
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11366	Method 3.11.4.9	RETAIN Method 3.11.4.9 as notified or amended by similar wording to like effect.	Support in part	FFNZ agrees that Method 9 ought to be retained but considers that some amendments are necessary e.g. to recognise future urban development and to gather information in effects of urban development and potential mitigation options.
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-9532	Method 3.11.4.10	AMEND Rule 3.11.4.10 to incorporate the periodic assessment of ecosystem health and safety from the human health perspective, covering both contact recreation and safe food take. This should be undertaken at the freshwater management unit level and at other levels as required.	Oppose	FFNZ considers that this imposes additional and unnecessary standards that will likely impose significant cost for no net benefit. FFNZ supports gathering further information and better understanding the catchment but thinks that is better addressed through the amendments as proposed by FFNZ is its submission on Variation 1.
CNI Iwi Land Management Limited	PC1-10795	Method 3.11.4.10	RETAIN Method 3.11.4.10 as written.	Support in part	FFNZ considers that some changes are needed to Method 10 to reflect its position on the short term and 80 year targets (Objective 1 and 3), to ensure

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74026				Oppose in part	that point source and diffuse discharges are both included and to include consideration of point source discharge consents.
Department of Conservation Submitter ID: 71759	PC1-10767	Method 3.11.4.10	AMEND Method 3.11.4.10 in a way that will ensure the coordinated monitoring of wetland and coastal environments with the most urgent accounting and monitoring being required for: <ul style="list-style-type: none"> wetlands (wetland extent/buffer extent, soil mineral/organic content (sediment), soil phosphorous, soil nitrogen, vegetation) freshwater species (fish) as a key indicator for ecosystem health Macroinvertebrate Community Index - rivers <p>Waikato River Delta (estuarine receiving environment).</p>	Oppose	FFNZ considers that this will likely impose additional and unnecessary standards that will likely impose significant cost for no net benefit. FFNZ supports gathering further information and better understanding the catchment but thinks that is better addressed through the amendments as proposed by FFNZ is its submission on Variation 1.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10611	Method 3.11.4.10	AMEND Method 3.11.4.10(d) to read: "An information and accounting system for the diffuse discharges from properties and enterprises that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges <u>to water</u> at an enterprise or property scale."	Support in part	FFNZ agrees that it is discharges to water (as opposed to leaching from the root zone, for example) that are relevant.
Fulton Hogan Limited Submitter ID:	PC1-10872	Method 3.11.4.10	AMEND Method 3.11.4.10(b) to read: "...assess progress towards achieving <u>Objectives 1 and 3</u> the Table 11-4 "	Support	FFNZ supports changing the reference to Objective 1 and 3 for reasons including that it does not support the 80 year targets and provided Objectives

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
74048			water quality attribute targets; and...		1 and 3 are amended as set out in FFNZ's submission on Variation 1.
GBC Winstone Submitter ID: 73992	PC1-3618	Method 3.11.4.10	AMEND Method 3.11.4.10 b. as follows: "Using the information collected... towards achieving <u>Objectives 1 and 3</u> the Table 11-4 water quality attribute targets; and"	Support	FFNZ supports changing the reference to Objective 1 and 3 for reasons including that it does not support the 80 year targets and provided Objectives 1 and 3 are amended as set out in FFNZ's submission on Variation 1.
Genesis Energy Limited Submitter ID: 74052	PC1-8817	Method 3.11.4.10	AMEND 3.11.4.10 (a)(ii) to read as follows, or words to like effect: "ii. <u>additional monitoring sites in sub-catchments and on tributaries</u> that are currently unrepresented in the existing monitoring network; and" Method 3.11.4.10: AMEND Map 3.11-1 to establish Freshwater Management Unit monitoring sites at, or very near the downstream boundary of an Freshwater Management Units to monitor the progress toward water quality objectives over the next 80 years AND identify the location of Freshwater Management Unit monitoring sites OR ADD a map or table that identifies the location of Freshwater Management Unit monitoring sites.	Support in part	FFNZ supports additional monitoring sites and gaining a better and more robust understanding of water quality. FFNZ agrees that monitoring sites ought to be downstream of FMUs but considers that the FMU is not the appropriate spatial scale for managing freshwater and would support a sub-catchment and/or grouping of related sub-catchments approach. FFNZ agrees that a map showing the monitoring sites would be helpful and considers this ought to be provided as part of the catchment profiles FFNZ proposes in its new Method 5A set out in FFNZ's submission on Variation 1.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5766	Method 3.11.4.10	RETAIN Method 3.11.4.10.	Support in part Oppose in part	FFNZ considers that some changes are needed to Method 10 to reflect its position on the short term and 80 year targets (Objective 1 and 3), to ensure that point source and diffuse discharges are both included and to include consideration of point source discharge consents.
Horticulture New Zealand (HortNZ)	PC1-10113	Method 3.11.4.10	AMEND Method 3.11.4.10 to read: "Waikato Regional Council will	Oppose in part	FFNZ has concerns that the decision support tools proposed by this submitter are based on allocation

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73801			<p>establish and operate a publicly available accounting system and monitoring in each Freshwater Management Unit, including:</p> <p>a. Collecting information on nitrogen, phosphorus, sediment and microbial pathogen levels in the respective fresh water bodies in each Freshwater Management Unit from:</p> <p>i. Council's existing river monitoring network; and</p> <p>ii. Sub-catchments that are currently unrepresented in the existing monitoring network; and</p> <p>iii. Lake Freshwater Management Units.</p> <p>b. Using the information collected to establish the baseline data for compiling a monitoring plan and to assess progress towards achieving the Table 11-1 water quality attribute targets and</p> <p>c. Using state of the environment monitoring data including biological monitoring tools such as the Macroinvertebrate Community Index to provide the basis for identifying and reporting on long-term trends; and</p> <p><u>ca. Produce a framework model for the greater Waikato River and surrounding land using the best available data, that can be adapted to include new decision support tools at the sub-catchment level.</u></p>		<p>or will be used to support an allocation approach. FFNZ does not support allocation of contaminants for reasons including that this will likely impose significant cost for no net benefit and there is no reliable or equitable basis for allocation.</p> <p>FFNZ agrees that information and accounting systems ought to also be at a sub-catchment scale.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			d. An information and accounting system for the diffuse discharges from properties and enterprises that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at a an sub-catchment, enterprise or property scale."		
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4461	Method 3.11.4.10	AMEND PPC1 to protect remaining wetlands and gully seeps and create new incentives to encourage the creation or reinstatement of wetland areas. AND RETAIN Method 3.11.4.10.	Oppose	FFNZ does not support a blanket approach to protecting all wetlands and gullies for reasons including that it is likely to impose significant cost for no net benefit. FFNZ instead supports a tailored and proportionate approach that considers critical source areas, sub-catchment characteristics and the resources reasonably available. FFNZ considers that some changes are needed to Method 10 to reflect its position on the short term and 80 year targets (Objective 1 and 3), to ensure that point source and diffuse discharges are both included and to include consideration of point source discharge consents.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9327	Method 3.11.4.10	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including biological monitoring tools... Community Index <u>and Cultural Health Index</u> to provide the basis for... d. An information <u>A freshwater</u>	Support in part Oppose in part	FFNZ supports freshwater accounting and understanding discharges of all contaminants. However FFNZ considers that this need to take into account all sources e.g. point source, natural sources, pests etc. FFNZ also has concerns that the targets are too onerous and flawed and is therefore concerned about additional standards, including Cultural Health Index. FFNZ also has concerns if the purpose of freshwater accounting is for considering or supporting allocation, which FFNZ considers is inappropriate, premature and unnecessary.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale...</u>		
Mercury NZ Limited Submitter ID: 73182	PC1-9594	Method 3.11.4.10	AMEND Method 3.11.4.10 (a)(ii) to read: "ii. <u>additional monitoring sites in sub-catchments and on tributaries that are currently unrepresented in the existing monitoring network; and...</u> " AND AMEND Method 3.11.4.10 (b) to read: "Using the information... <u>Table 3.11-1....</u> " AND ADOPT representative FMU monitoring sites at, or very near, the downstream boundary of an FMU to monitor the progress toward water quality objectives over the next 80 years AND AMEND Map 3.11-1 OR ADD another map or table that identifies the location of FMU water quality monitoring sites.	Support in part	FFNZ support additional monitoring sites and better understanding water quality. However, it considers that further amendments to Method 10 are needed, including to amend targets and ensure all sources of contaminants are accounted for not just diffuse discharges.
Miraka Limited Submitter ID: 73492	PC1-8887	Method 3.11.4.10	RETAIN Method 3.11.4.10.	Support in part Oppose in part	FFNZ considers that some changes are needed to Method 10 to reflect its position on the short term and 80 year targets (Objective 1 and 3), to ensure that point source and diffuse discharges are both included and to include consideration of point source discharge consents.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4633	Method 3.11.4.10	RETAIN Method 3.11.4.10.	Support in part Oppose in	FFNZ considers that some changes are needed to Method 10 to reflect its position on the short term and 80 year targets (Objective 1 and 3), to ensure that point source and diffuse discharges are both

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
				part	included and to include consideration of point source discharge consents.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11854	Method 3.11.4.10	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including biological monitoring tools... <u>Community Index and Cultural Health Index</u> to provide the basis for... d. An information <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale...</u> "	Support in part Oppose in part	FFNZ supports freshwater accounting and understanding discharges of all contaminants. However FFNZ considers that this need to take into account all sources e.g. point source, natural sources, pests etc. FFNZ also has concerns that the targets are too onerous and flawed and is therefore concerned about additional standards, including Cultural Health Index. FFNZ also has concerns if the purpose of freshwater accounting is for considering or supporting allocation, which FFNZ considers is inappropriate, premature and unnecessary.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-7700	Method 3.11.4.10	AMEND Method 3.11.4.10 to incorporate a five year time frame (or an appropriate timeframe, but within the life of PPC1) for implementation of a publicly available accounting system and monitoring programme in each Farm Management Unit. AND AMEND to ensure that Method 3.11.4.10 clause (c) continues to refer to the Macroinvertebrate Community Index as an option rather than a requirement. AND AMEND Method 3.11.4.10 to identify total nitrate and phosphate	Oppose	FFNZ considers that this is better addressed through the catchment profile proposed and new method 5A set out in FFNZ's submission on Variation 1. FFNZ is concerned that if freshwater accounting that only looks at diffuse discharges is linked to FEPs that will result in or support an allocation approach. FFNZ does not support input controls or the BPO proposal proposed by this submitter. It opposes amendments to identify total N, P etc as proposed by this submitter.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			fertiliser use and the use of imported animal feeds as information to be collated and published.		
Raukawa Charitable Trust Submitter ID: 74073	PC1-10567	Method 3.11.4.10	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including biological monitoring tools... Community Index <u>and Cultural Health Index</u> to provide the basis for... d. An information <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale...</u> "	Support in part Oppose in part	FFNZ supports freshwater accounting and understanding discharges of all contaminants. However FFNZ considers that this need to take into account all sources e.g. point source, natural sources, pests etc. FFNZ also has concerns that the targets are too onerous and flawed and is therefore concerned about additional standards, including Cultural Health Index. FFNZ also has concerns if the purpose of freshwater accounting is for considering or supporting allocation, which FFNZ considers is inappropriate, premature and unnecessary.
Ravensdown Limited Submitter ID: 74058	PC1-10133	Method 3.11.4.10	RETAIN the intent of Method 3.11.4.10 as it is currently written.	Support in part Oppose in part	FFNZ considers that some changes are needed to Method 10 to reflect its position on the short term and 80 year targets (Objective 1 and 3), to ensure that point source and diffuse discharges are both included and to include consideration of point source discharge consents.
Taupo District Council Submitter ID: 74207	PC1-8155	Method 3.11.4.10	RETAIN the intent of Method 3.11.4.10 AND CLARIFY the expected timeframes for data collection and the accounting system.	Support in part Oppose in part	FFNZ considers that some changes are needed to Method 10 to reflect its position on the short term and 80 year targets (Objective 1 and 3), to ensure that point source and diffuse discharges are both included and to include consideration of point source discharge consents.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					FFNZ also supports additional monitoring and obtaining a better and robust understanding of water quality issues.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9370	Method 3.11.4.10	CLARIFY that Waikato Regional Council is to protect intellectual property. Method 3.11.4.10 AND provide a publicly accessible register of property Nitrogen Discharge Allowance.	Support in part Oppose in part	FFNZ agrees that confidentiality and privacy ought to be maintained. Subject tot his, FFNZ supports publicly available information but considers that individual NDAs by reference to properties is not appropriate and this ought to be on an aggregated and non-identifiable basis. FFNZ also considers there ought to be information collated as part of a sub-catchment profile as proposed in Method 5A as set out in FFNZ's submission on Variation 1.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11803	Method 3.11.4.10	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including biological monitoring tools... Community Index and <u>Cultural Health Index</u> to provide the basis for... d. An information <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale...</u> "	Support in part Oppose in part	FFNZ supports freshwater accounting and understanding discharges of all contaminants. However FFNZ considers that this need to take into account all sources e.g. point source, natural sources, pests etc. FFNZ also has concerns that the targets are too onerous and flawed and is therefore concerned about additional standards, including Cultural Health Index. FFNZ also has concerns if the purpose of freshwater accounting is for considering or supporting allocation, which FFNZ considers is inappropriate, premature and unnecessary.
The Royal Forest and Bird Protection Society of New Zealand	PC1-8407	Method 3.11.4.10	RETAIN Method 3.11.4.10	Support in part Oppose in	FFNZ considers that some changes are needed to Method 10 to reflect its position on the short term and 80 year targets (Objective 1 and 3), to ensure that point source and diffuse discharges are both

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Incorporated Submitter ID: 74122				part	included and to include consideration of point source discharge consents.
Timberlands Limited Submitter ID: 73036	PC1-3426	Method 3.11.4.10	RETAIN Method 3.11.4.10 AND ENSURE the existing monitoring network is upgraded by adding new monitoring sites in sub-catchments where there are none and where the monitoring location is not appropriate (monitoring sites that were set up to monitor floods).	Support in part Oppose in part	FFNZ considers that some changes are needed to Method 10 to reflect its position on the short term and 80 year targets (Objective 1 and 3), to ensure that point source and diffuse discharges are both included and to include consideration of point source discharge consents. FFNZ also supports additional monitoring and obtaining a better and robust understanding of water quality issues.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10443	Method 3.11.4.10	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including biological monitoring tools... Community Index and <u>Cultural Health Index</u> to provide the basis for... d. An information <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale...</u> "	Support in part Oppose in part	FFNZ supports freshwater accounting and understanding discharges of all contaminants. However FFNZ considers that this need to take into account all sources e.g. point source, natural sources, pests etc. FFNZ also has concerns that the targets are too onerous and flawed and is therefore concerned about additional standards, including Cultural Health Index. FFNZ also has concerns if the purpose of freshwater accounting is for considering or supporting allocation, which FFNZ considers is inappropriate, premature and unnecessary.
Waikato and Waipa River Iwi Submitter ID:	PC1-3425	Method 3.11.4.10	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ...	Support in part	FFNZ supports freshwater accounting and understanding discharges of all contaminants. However FFNZ considers that this need to take into

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
74035			Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including biological monitoring tools... Community Index <u>and Cultural Health Index</u> to provide the basis for... d. An information <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale...</u> "	Oppose in part	account all sources e.g. point source, natural sources, pests etc. FFNZ also has concerns that the targets are too onerous and flawed and is therefore concerned about additional standards, including Cultural Health Index. FFNZ also has concerns if the purpose of freshwater accounting is for considering or supporting allocation, which FFNZ considers is inappropriate, premature and unnecessary.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11367	Method 3.11.4.10	AMEND Method 3.11.4.10(d) to read: "An information and accounting system for the diffuse discharges from properties and enterprises that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at an enterprise or property scale <u>or sub-catchment level.</u> "	Support in part	FFNZ agrees that "sub-catchment level" ought to be added to this method. FFNZ considers that further changes are needed to Method 10 to reflect its position on the short term and 80 year targets (Objective 1 and 3), to ensure that point source and diffuse discharges are both included and to include consideration of point source discharge consents.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10987	Method 3.11.4.11	AMEND Method 3.11.4.11(a) to read: "a. Review and report on the progress towards and achievement of the 80 year water quality objectives of Chapter 3.11 according to amended Table 3.11-1."	Support in part	FFNZ does not support the 80 year targets and therefore supports the deletion of the reference to them. However, it considers that Table 3.11-1 ought to be amended to delete the 80 year targets and to address FFNZ's concerns as set out in its submission on Variation 1.
Ballance Agri-Nutrients Limited	PC1-6908	Method 3.11.4.11	AMEND Method 3.11.4.11(a) to read: "Review and report on the..."	Support in part	FFNZ does not support the 80 year targets and therefore considers that the reference to them ought

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74036			objectives of Chapter 3.11, <u>and the applicability of the 80-year timeframe, should the science and the information available advance to the point where it may be possible to achieve the water quality objectives in a shorter timeframe without causing unacceptable social and economic harm:..</u> " AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	Oppose in part	to be deleted. In the alternative, FFNZ would support a proposal like that proposed by this submitter that provided for them to be amended and to take into account social and economic harm.
DairyNZ Submitter ID: 74050	PC1-10243	Method 3.11.4.11	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Accounting system and monitoring – Land activities that affect water</u> Monitoring and evaluation of the implementation of Chapter 3.11/... Waikato Regional Council will: a. Review and report on the progress towards and achievement of the 80-year water quality objectives of Chapter 3.11. a.i <u>Set up a monitoring and accounting system for diffuse discharges that documents current contaminant loads of nitrogen, phosphorus, sediment and microbial pathogens, and expected future loads after mitigation actions are put in place and implemented.</u> b. Research, and identify <u>and implement methods a programme of work to assess measure</u> actions at a	Support in part Oppose in part	FFNZ considers that the accounting system ought to take into account all sources of water quality e.g. point source, natural, etc and not just diffuse discharges. FFNZ does not support modelling of and accounting for loads, or tracking of contaminants at an individual level, if this is then used to support or justify an allocation approach for reasons including that such information is unlikely to be sufficiently robust and would likely impose significant cost for no net benefit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			sub-catchment, property and enterprise level, and for their contribution to reductions in the discharge of contaminants... c. ... d. ... e. <u>Prepare for plan reviews by working in partnership with industry to achieve a-d above, in order to gain an accurate assessment of all sources that contribute to contaminant loads from the land, and track changes in diffuse and point source discharges at the scale of individual landowners and businesses, and collate information on the functioning and success of any Certified Industry Scheme.</u> "		
Department of Conservation Submitter ID: 71759	PC1-11052	Method 3.11.4.11	AMEND Method 3.11.4.11 to make a clear link between this method for monitoring and evaluation the implementation of Chapter 3.11 and the accounting and monitoring system developed under Method 3.11.4.10, AND AMEND Method 3.11.4.11 to provide more specificity around the frequency of reporting, with 3-yearly reporting recommended.	Oppose	FFNZ is concerned that linking this method with Method 10 will result in more onerous obligations and impose unreasonable cost. FFNZ supports reporting but considers it ought to be at a reasonable scale and reasonable interval.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10613	Method 3.11.4.11	RETAIN Method 3.11.4.11.	Support in part Oppose in part	FFNZ supports the overall intent of Method 11 but considers changes are made including to amend the targets, ensure all sources contributing to water quality are considered and consider point source discharge consents as proposed in FFNZ's submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5767	Method 3.11.4.11	AMEND Method 3.11.4.11 as required to reflect the alternative approach proposed in the submission.	Oppose	FFNZ does not support the alternative approach proposed by this submitter for reasons including that nitrogen and other contaminants can be more appropriately managed through tailored FEPs and a reasonable consenting pathway and the proposed approach will result in significant cost for no net benefit.
GBC Winstone Submitter ID: 73992	PC1-3622	Method 3.11.4.11	AMEND Method 3.11.4.11 a. as follows: "Review and report on the ... and achievement of the 80-year <u>water quality objectives of Objective 1 in Chapter 3.11.</u> "	Support in part	FFNZ does not support the 80 year targets and therefore supports the deletion of the reference to them. However, it considers that Objective 1 and Table 3.11-1 ought to be amended to delete the 80 year targets and to address FFNZ's concerns as set out in its submission on Variation 1.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10114	Method 3.11.4.11	RETAIN Method 3.11.4.11	Support in part Oppose in part	FFNZ supports the overall intent of Method 11 but considers changes are made including to amend the targets, ensure all sources contributing to water quality are considered and consider point source discharge consents as proposed in FFNZ's submission on Variation 1.
J Swap Ltd Submitter ID: 71618	PC1-6435	Method 3.11.4.11	AMEND PPC1 so that any method or rule around consent renewal is assessed on a case-by-case basis for regionally significant industry and takes into account existing industry infrastructure investment to date. AND ADD into Method 3.11.4.11 - "Waikato Regional Council will: a. Review and report... <u>f. Recognise current infrastructure investment by Regionally significant industry,</u> <u>when assessing resource consent renewals for existing activities; and</u> <u>g. Recognise the level of treatment</u>	Support in part	FFNZ supports an approach that considers the extent of the investment but considers this ought to apply to diffuse discharges as well as point source and considers it could apply to diffuse discharges through the MPA framework and consideration of significance of investment and resources reasonably available to the farm enterprise as set out in FFNZ's submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			provided by Regionally significant industry infrastructure under any existing resource consents and apply a Best Practicable Option approach when assessing resource consent renewals for those existing activities." AND AMEND to include the above change into Rule 3.11.5.5 for renewals of resource consents associated with regionally significant industries; or relief to that effect.		
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4462	Method 3.11.4.11	AMEND PPC1 to protect remaining wetlands and gully seeps and create new incentives to encourage the creation or reinstatement of wetland areas. AND RETAIN Method 3.11.4.11	Oppose	FFNZ does not support a blanket approach to protecting all wetlands and gullies for reasons including that it is likely to impose significant cost for no net benefit. FFNZ instead supports a tailored and proportionate approach that considers critical source areas, sub-catchment characteristics and the resources reasonably available.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9330	Method 3.11.4.11	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. Review and report Report on the progress towards and achievement of the 10-year (Objective 3) and 80-year (Objective 1) water quality objectives of Chapter 3.11 targets in 2020 and 2024." AND DELETE 3.11.4.11 b.	Oppose	FFNZ does not support the 80 year targets and while it supports monitoring it considers that reporting against targets is likely to be misleading and not provide an accurate reflection of water quality improvements.
Mercury NZ Limited Submitter ID: 73182	PC1-9596	Method 3.11.4.11	AMEND Method 3.1.4.11 (a) and (e) to read: "a. Review and report on the progress towards and achievement of the 80-year water quality objectives of Chapter 3.11 <u>every 5 years...</u>	Support in part Oppose in part	FFNZ considers that an appropriate timeframe for monitoring and reporting ought to be adopted. FFNZ considers that the name of the CIS ought to reflect what it is but is concerned that "sector" is not

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			e. Work with industry to collate information on the functioning and success of any Certified industry <u>Sector Scheme.</u> "		the right term.
Miraka Limited Submitter ID: 73492	PC1-8888	Method 3.11.4.11	RETAIN Method 3.11.4.11.	Support in part Oppose in part	FFNZ supports the overall intent of Method 11 but considers changes are made including to amend the targets, ensure all sources contributing to water quality are considered and consider point source discharge consents as proposed in FFNZ's submission on Variation 1.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4634	Method 3.11.4.11	RETAIN Method 3.11.4.11.	Support in part Oppose in part	FFNZ supports the overall intent of Method 11 but considers changes are made including to amend the targets, ensure all sources contributing to water quality are considered and consider point source discharge consents as proposed in FFNZ's submission on Variation 1.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11855	Method 3.11.4.11	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. Review and report <u>Report on the progress towards and achievement of the 10-year (Objective 3) and 80-year (Objective 1) water quality objectives of Chapter 3.11</u> targets in 2020 and 2024." AND DELETE 3.11.4.11 b.	Oppose	FFNZ does not support the 80 year targets and while it supports monitoring it considers that reporting against targets is likely to be misleading and not provide an accurate reflection of water quality improvements.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-7701	Method 3.11.4.11	AMEND Method 3.11.4.11 as reflect the reasons for the submission and/or the alternative approach proposed in the submission. AND AMEND Clause (e) to read: "...e) Work with industry a <u>broad range of stakeholders</u> to collate information on the functioning and	Support in part	While FFNZ does not agree with the proposed changes to the CIS by this submitter, it does agree that a range of stakeholders ought to be consulted regarding the functioning and success of the CIS. Therefore FFNZ supports this particular submission point.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			success of any Certified Industry Scheme."		
Raukawa Charitable Trust Submitter ID: 74073	PC1-10568	Method 3.11.4.11	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. Review and report Report on the progress towards and achievement of the 10-year (Objective 3) and 80-year (Objective 1) water quality objectives of Chapter 3.11 targets in 2020 and 2024." AND DELETE 3.11.4.11 b.	Oppose	FFNZ does not support the 80 year targets and while it supports monitoring it considers that reporting against targets is likely to be misleading and not provide an accurate reflection of water quality improvements.
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5742	Method 3.11.4.11	AMEND Method 3.11.4.11 so the accounting system must measure, monitor and publish all recorded metrics and audits from industry schemes in a way that is transparent, clear and accessible to the public.	Support in part	FFNZ supports a transparent and robust monitoring approach that focuses on gaining a better understanding of water quality issues. However, FFNZ is concerned that privacy and confidentiality is maintained and that the information is not used to support or justify an allocation approach.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11804	Method 3.11.4.11	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. Review and report Report on the progress towards and achievement of the 10-year (Objective 3) and 80-year (Objective 1) water quality objectives of Chapter 3.11 targets in 2020 and 2024." AND DELETE 3.11.4.11 b.	Oppose	FFNZ does not support the 80 year targets and while it supports monitoring it considers that reporting against targets is likely to be misleading and not provide an accurate reflection of water quality improvements.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	PC1-8408	Method 3.11.4.11	AMEND Method 3.11.4.11 to include further monitoring and assessment of the effectiveness of the methods proposed to address water quality.	Support in part Oppose in part	FFNZ supports understanding water quality issues and the effects of mitigations but it is concerned that privacy and confidentiality is maintained and that the information is not used to support or justify an allocation approach.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74122					
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10460	Method 3.11.4.11	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. Review and report Report on the progress towards and achievement of the 10-year (Objective 3) and 80-year (Objective 1) water quality objectives of Chapter 3.11 targets in 2020 and 2024." AND DELETE 3.11.4.11 b.	Oppose	FFNZ does not support the 80 year targets and while it supports monitoring it considers that reporting against targets is likely to be misleading and not provide an accurate reflection of water quality improvements.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3428	Method 3.11.4.11	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. Review and report Report on the progress towards and achievement of the 10-year (Objective 3) and 80-year (Objective 1) water quality objectives of Chapter 3.11 targets in 2020 and 2024." AND DELETE 3.11.4.11 b.	Oppose	FFNZ does not support the 80 year targets and while it supports monitoring it considers that reporting against targets is likely to be misleading and not provide an accurate reflection of water quality improvements.
Waikato Environment Centre Submitter ID: 73436	PC1-6250	Method 3.11.4.11	AMEND Method 3.11.4.11 to provide for monitoring of compliance to be undertaken by a truly independent party AND ADD a transparent approach to developing, monitoring, compliance and implementation systems. AND ADD steps to ensure that effective and cost-effective monitoring, compliance and implementation capacity is in place at	Support in part	FFNZ supports a cost effective, efficient, transparent and robust monitoring approach that focuses on gaining a better understanding of water quality issues. However, FFNZ is concerned that privacy and confidentiality is maintained and that the information is not used to support or justify an allocation approach.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>the time the regime is introduced. AND ADD monitoring and reporting on and reviewing of the implementation of the policy. AND ADD transparent public information for freshwater discharges and takes. AND ADD to provide for a council report every two years on progress towards meeting objectives, limits and targets. AND ADD to provide for the steps that councils will take if the combined interventions are not sufficient. AND AMEND to include provisions to set out clear consequences for non-compliance, and that sufficient resources and commitment be provided for prosecution and enforcement.</p>		
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11368	Method 3.11.4.11	AMEND Method 3.11.4.11 to read: "b. Research and identify methods including an adaptive management and mitigation planning approach developed for the relevant sub-catchment to measure actions at a sub-catchment, property and enterprise level, and their contribution to reduction in the discharge of contaminants. ... d. Collate data on the number of land use resource consents issued under the rules of this chapter, the number of Farm Environment Plans	Support in part Oppose in part	<p>In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available.</p> <p>FFNZ does not support allocation and does not support an approach that collects information to support or justify an allocation approach.</p> <p>FFNZ supports the CIS as an option for farmers who would rather deal with their industry body (or body running the scheme) than Council.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			completed, compliance with the actions listed in Farm Environment Plans, Nitrogen Reference Points for properties and enterprises, and nitrogen discharge data reported under Farm Environment Plans, <u>and the actions for discharge allocation for the relevant sub-catchment.</u> e. Work with industry to collate information on the functioning and success of any Certified Industry Scheme <u>adaptive management and mitigation approach developed by an enterprise."</u>		
AFFCO New Zealand Limited Submitter ID: 74140	PC1-7671	Method 3.11.4.12	REPLACE references to 'BMP' and 'GMP' with 'BPO'. AND AMEND Method 3.11.4.12(a) to read as follows: "Develop and disseminate best <u>practicable options management practice</u> guidelines for reducing the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, and..."	Support in part	FFNZ supports a BPO approach provided it is based on a framework that is similar to its MPA framework and not on input controls (FFNZ refers to its submission on Variation 1).
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6910	Method 3.11.4.12	ADOPT Method 3.11.4.12 as notified subject to the following amendment. AND AMEND (a) to read: "Develop and disseminate best management practice guidelines, <u>including 'Industry Agreed Good Management Practices' being the practices described in the document entitled 'Industry-agreed Good Management Practices relating to water quality' -</u>	Support	FFNZ agrees that GMP is a better term than BMP and that if GMP is referred to it ought to be industry agreed GMP.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			dated September 2015, for reducing the diffuse..." AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.		
Buckley, Peter Ross Submitter ID: 71423	PC1-1424	Method 3.11.4.12	RETAIN Method 3.11.4.12.	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
Cameron, Bruce Submitter ID: 60603	PC1-6385	Method 3.11.4.12	RETAIN Method 3.11.4.12.	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10796	Method 3.11.4.12	AMEND Method 3.11.4.12 to read: "Waikato Regional Council will: <u>a. require that Good Management Practices are implemented and</u> <u>a b. Develop and disseminate best management practice guidelines for reducing the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens; and</u> b-c. Support research into methods for reducing diffuse discharges of contaminants to water."	Oppose	FFNZ supports a tailored and proportionate approach and considers that this method should not require GMP to be implemented. That ought to be considered through the FEP process.
DairyNZ	PC1-10244	Method	AMEND Method 3.11.4.12 to read:	Support in	FFNZ agrees that the guidelines should not be best

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74050		3.11.4.12	"3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges/... Waikato Regional Council will: a. Develop and disseminate best management practice guidelines for reducing the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens; and b. <u>Work with primary industry and support research into methods for reducing diffuse discharges of contaminants to water.</u> "	part	practice for reasons including that this standard is unreasonably high and will impose significant cost for no net benefit. FFNZ agrees that Council should work with primary industry but considers this ought to be broader and include all relevant stakeholders.
Department of Conservation Submitter ID: 71759	PC1-11053	Method 3.11.4.12	RETAIN Method 3.11.4.12.	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10615	Method 3.11.4.12	AMEND Method 3.11.4.12 as follows: "Waikato Regional Council will: a. <u>Work with stakeholders to</u> d Develop and disseminate best industry agreed good management practice guidelines for reducing the diffuse discharges <u>to water</u> of nitrogen, phosphorus, sediment and microbial pathogens; and..."	Support	FFNZ agrees that WRC ought to work with stakeholders and that industry agreed GMP is the appropriate standard. FFNZ also agrees that it is discharges to water (as opposed to nitrogen leaving the root zone, for example) that are relevant.
Genesis Energy Limited Submitter ID: 74052	PC1-8728	Method 3.11.4.12	RETAIN Method 3.11.4.12 (in same or similar form).	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
Hill Country Farmers Group Submitter ID: 73321	PC1-7837	Method 3.11.4.12	AMEND Method 3.11.4.12 to include reference to landowner/occupier education and support in applying Best Management Practice guidance.	Support in part Oppose in part	FFNZ agrees that education is important but it does not agree that BMP is the right standard and considers it ought to be industry agreed GMP.
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4463	Method 3.11.4.12	AMEND PPC1 to protect remaining wetlands and gully seeps and create new incentives to encourage the creation or reinstatement of wetland areas. AND RETAIN Method 3.11.4.12	Oppose	FFNZ does not support a blanket approach to protecting all wetlands and gullies for reasons including that it is likely to impose significant cost for no net benefit. FFNZ instead supports a tailored and proportionate approach that considers critical source areas, sub-catchment characteristics and the resources reasonably available.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9331	Method 3.11.4.12	RETAIN Method 3.11.4.12.	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
Mercury NZ Limited Submitter ID: 73182	PC1-9597	Method 3.11.4.12	RETAIN Method 3.11.4.12.	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
Miraka Limited	PC1-8889	Method	RETAIN Method 3.11.4.12.	Support in	In principle, FFNZ sees merit in Method 12 but it

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73492		3.11.4.12		part	considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4635	Method 3.11.4.12	RETAIN Method 3.11.4.12.	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11856	Method 3.11.4.12	RETAIN Method 3.11.4.12.	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-7703	Method 3.11.4.12	AMEND Method 3.11.4.12 by restricting application of the Method to diffuse discharges from agricultural activities. AND AMEND to specify that the Waikato Regional Council will require continuing development and implementation of best practice minimum standards for agricultural discharges. AND AMEND by replacing the term 'Best Management Practices' with	Oppose	FFNZ considers that Method 12 ought to apply to all discharges. FFNZ does not support detailed or onerous minimum standards or input controls. FFNZ considers that a tailored FEP approach that considers critical source areas and uses the MPA framework explained in FFNZ's submission on Variation 1 is appropriate. FFNZ does not support replacing BMP with BPO for reasons including that it does not support the submitter's BPO framework which is based on input controls.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			'Best Practicable Option'.		
Pinnell, Graham Submitter ID: 74007	PC1-4370	Method 3.11.4.12	AMEND Method 3.11.4.12 to acknowledge that implementation of unaffordable mitigations is contingent upon vulnerable landowners having access to financial support. AND ADD to the Definition of Best management practice the words: " <u>and taking account of cost effectiveness.</u> " AND DELETE Method 3.11.4.12(a) and REPLACE with the words: " <u>Work with industry sectors to develop and disseminate a consistent set of best management guidelines that targets Objective 3 attributes, taking account of the cost effectiveness of each mitigation.</u> "	Support in part	FFNZ agrees that costs need to be taken into account and funding needs to be considered. However, FFNZ is concerned that the bar of "BMP" is likely to still be too high and considers that industry agreed GMP is the appropriate standard. FFNZ also agrees that WRC should work with industry to develop principles but these should be based on GMP not BMP.
Primary Land Users Group Submitter ID: 71427	PC1-11171	Method 3.11.4.12	AMEND Method 3.11.4.12 to reflect the determination of best practicable options rather than best practice.	Support in part	FFNZ would support an approach based on BPO but is concerned with how this would be defined. FFNZ considers this ought to be based on the MPA framework proposed in FFNZ's submission on Variation 1 (or something similar) and not on input controls that other submitters have proposed, for example.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10570	Method 3.11.4.12	RETAIN Method 3.11.4.12.	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
Ravensdown Limited	PC1-10135	Method 3.11.4.12	RETAIN the intent of Method 3.11.4.12 as it is currently written.	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74058			AND AMEND the references to 'best' practice and 'best' management practice guidelines to <u>good</u> practice and <u>good</u> management practice guidelines.		industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
Taupo District Council Submitter ID: 74207	PC1-8157	Method 3.11.4.12	RETAIN Method 3.11.4.12	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8414	Method 3.11.4.12	AMEND PPC1 to include new schedules that outline good and best management practice and incorporate these into the rules.	Oppose	While FFNZ supports in principle an approach based on industry agreed GMP, it does not consider that these principles should be enshrined in the plan change or regulatory and considers that they need to be flexible and adaptable as circumstances, standards and technology change.
Timberlands Limited Submitter ID: 73036	PC1-3427	Method 3.11.4.12	AMEND Method 3.11.4.12 to read: "Waikato Regional Council will: a. <u>Require that Good Management Practices are implemented;</u> and a.b. Develop and disseminate best management practice guidelines..."	Oppose	FFNZ supports a tailored and proportionate approach and considers that this method should not require GMP to be implemented. That ought to be considered through the FEP process.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10464	Method 3.11.4.12	RETAIN Method 3.11.4.12.	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3429	Method 3.11.4.12	RETAIN Method 3.11.4.12.	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
Waikato Dairy Leaders Group Submitter ID: 74049	PC1-11015	Method 3.11.4.12	RETAIN the intent of Method 3.11.4.12 AND AMEND by expanding the scope AND AMEND by providing further detail about the development of guidance material for plan users in assessing, requiring and monitoring mitigation practices AND AMEND to require Waikato Regional Council to work with research agencies and industry bodies to develop a robust and peer reviewed guide on mitigations, particularly 'edge of field' mitigations such as wetlands, bunds and sediment traps AND AMEND Method 3.11.4.12 to read: "3.11.4.2: Support research and dissemination of best practice guidelines to reduce diffuse discharges. Waikato Regional Council will: a) Develop and disseminate best management practice guidelines for reducing the diffuse discharges of	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1. FFNZ agrees that the scope could be expanded to include guidance about edge of field mitigations and that "BMP" ought to be deleted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			nitrogen, phosphorus, sediment and microbial pathogens; and..."		
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11369	Method 3.11.4.12	AMEND Method 3.11.4.12 to read: "3.11.4.12 Support research and dissemination of best good practice guidelines to reduce diffuse discharges... a. Develop and disseminate best good management practice guidelines for reducing the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens; and..."	Support in part	FFNZ agrees that the standard ought to be "GMP" not "BMP." FFNZ considers that Method 12 requires further amendment so that all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2137	Method 3.11.4.12	RETAIN Method 3.11.4.12.	Support in part	In principle, FFNZ sees merit in Method 12 but it considers that amendments are required to refer to industry agreed GMP (not BMP), all discharges are included (not just diffuse) and consultation with relevant stakeholders (including in developing guidelines for matters such as models other than Overseer etc). FFNZ refers further to its submission on Variation 1.
Section 3.11.5: Rules					
Aston, Penelope Submitter ID: 73811	PC1-5366	Section 3.11.5: Rules	3.11.5 Rules: DELETE the Nitrogen Reference Point from PPC1. OR AMEND to ensure that the OVERSEER Model is not solely relied on but is part of a range of measurement tools. AND AMEND to ensure where Overseer is used that Best Management Practices are applied, including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters.	Support in part Oppose in part	FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults. FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. FFNZ supports a sub-catchment approach with

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND REMOVE the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point through these provisions including rules as losses are low.</p> <p>AND ADOPT a sub-catchment approach to addressing contaminants that are relevant to each farm, not a blanket restriction of one particular nutrient that may not even be relevant to the water bodies in that sub-catchment.</p> <p>AND AMEND to use Farm Environment Plans to determine what would work best on each farm and science to determine which contaminants are an issue in each sub-catchment.</p> <p>AND AMEND the rules so that they are effects and science based, not based on grandparenting.</p> <p>AND AMEND to require Farm Environment plans only in sub-catchments where science indicates improvements are required.</p> <p>AND ENSURE independent panel is available to ensure accountability and enable contested points between staff and farmers to be settled without expensive appeals to the Environment Court.</p> <p>AND AMEND thresholds for mandatory stock exclusion to</p>		<p>tailored and proportionate FEPs and a focus on the contaminants at issue as opposed to a one size fits all approach or focusing on any one particular contaminant.</p> <p>FFNZ supports effects based rules as opposed to rules based on ownership or a one size fits all approach or rules based on models and assumptions.</p> <p>FFNZ agrees that a dispute resolution mechanism ought to be provided and considers that this is best addressed through amendments to Schedule 1 as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities and also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain and requiring all stock to be excluded from all water bodies will impose significant cost for no net benefit.</p> <p>FFNZ supports a critical source area assessment in the FEPs that considers mitigations applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>nationally recommended standards (Clean Water Report 2017). AND AMEND so that fencing is required above the 15 degrees threshold for intensive farming operations (over 18 stock units per hectare). AND AMEND mitigations so they are set on a farm by farm basis and focused on management of clearly identified and measurable critical source management areas. AND AMEND so that rules are focused on reducing impacts from intensive agriculture >18su/ha rather than applying blanket rules to all extensive agriculture. AND AMEND PPC1 so Farm Environment Plans are produced by the landowner with council guidance and support. AND DELETE timeframes and instead set time frames through consultation with the farmer, taking into account the amount of council subsidy available and the individual farmer's financial constraints and the sensitivity of the water-body to any impact.</p>		<p>appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP.</p> <p>FFNZ considers that the timeframes need to be amended to recognise the 2 year delay since notification of PC1 and ought to be reasonable.</p>
A S Wilcox & Sons Ltd Submitter ID: 73142	PC1-4319	Section 3.11.5: Rules	ADD a NEW Restricted Discretionary Rule to enable collaborative management by a catchment collective.	Oppose	FFNZ also supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate or manage contaminants

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					and/or self regulate.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11003	Section 3.11.5: Rules	ADD a NEW Rule to read: "3.11.5.9 Prohibited Activity Rule - The discharge of sediment from disturbed land to water without a buffer Rule 3.11.5.9 Prohibited Activity Rule - The discharge of sediment from disturbed land to water without a buffer <u>Except where authorised by consent or any other rule in this plan, any discharge of sediment without mitigation from disturbed land to a waterway in Schedule C is a prohibited activity."</u>	Oppose	FFNZ does not support a prohibited activity status for reasons including that this does not reasonably recognise the circumstances of farming, would likely impose significant cost for no net benefit and is not appropriate in a strict liability framework or in the context of farming activities which by their nature are uncertain and subject to many changes e.g. climatic events etc.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11500	Section 3.11.5: Rules	ADD a NEW discretionary activity Rule for situations where the standards and conditions of Rules 3.11.5.1 to 3.11.5.6 are not met. AND IF Nitrogen is to be allocated through PPC1 THEN AMEND PPC1 through either amending existing Policies (such as Policy 1) and Rules (such as 3.11.5.1 to 3.11.5.7) OR including a new Policy and associated Rules which sets out how Nitrogen will be allocated and discharges managed.	Support in part Oppose in part	FFNZ supports a RDA rule where an activity does not meet the standards in rules 1 to 5 and a discretionary activity rule for land use change. FFNZ does not support nitrogen allocation and opposes the adoption of rules to allocate.
Department of Conservation Submitter ID: 71759	PC1-11054	Section 3.11.5: Rules	PUT ON HOLD the Rules [in section 3.11.5] until an evaluation is undertaken to illustrate whether the rules proposed are the most appropriate way to achieve the objectives. If the existing rules are	Oppose	FFNZ is concerned that the rules are already too stringent, will likely over achieve the desired water quality and will impose significant cost. FFNZ opposes any proposal to make the rules or the activity status or the standards more restrictive.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>determined not to be the most appropriate, replacement rules would need to be implemented in PPC1 AND REVIEW the Permitted Activity Rules to ensure they do not authorise activities that would not achieve the standards in s70 RMA, AND ensure any rules for activities that do not meet these standards are controlled activities as a minimum AND AMEND the stock exclusion provisions in the Rules to require that sheep are excluded from outstanding water bodies, and that cattle, horses, deer and pigs are excluded from all water bodies, including ephemeral water bodies. This should also be reflected in Schedule C and throughout Chapter 3.11 AND ADD additional rule provisions to protect inanga spawning habitat.</p>		<p>FFNZ is concerned that the stock exclusion rules are already too stringent and will impose significant cost for no net benefit. FFNZ oppose any proposal to make the stock exclusion rules more stringent. FFNZ considers that it is not realistic nor appropriate to require sheep to be excluded. FFNZ also considers that the water bodies should be limited to accord water bodies and should not be extended to even more water bodies than is currently proposed.</p>
<p>Gleeson, Graeme B Submitter ID: 73800</p>	<p>PC1-6410</p>	<p>Section 3.11.5: Rules</p>	<p>AMEND Schedule 1 to ensure that Farm Environment Plans are as uncomplicated as possible, including plans that are hand-written. AND AMEND to ensure supporting documents outlining Good Management Practices, as recognised by industry, are readily available to all land users. AND AMEND to ensure that Farm Environment Plans include who will be responsible for and when and how mitigation will occur. The financial</p>	<p>Support in part Oppose in part</p>	<p>FFNZ supports a pragmatic approach to FEPs. FFNZ supports dissemination of industry agreed GMP. FFNZ considers that sufficient flexibility ought to be provided in FEPs to recognise the particular farm enterprise and to respond to changing circumstances e.g. climatic events. Therefore, while it may be appropriate in some cases to state the person responsible and when the mitigation will occur FFNZ considers that flexibility ought to be provided and this should not be compulsory.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>position of a farm as a means of justifying the amount of mitigation undertaken by a farm should not be required.</p> <p>AND AMEND the rules so that farms with a low risk of contaminant loss are enabled to operate for the next 10 years as a permitted activity, subject to conditions relating to stocking rate and the preparation of a Beef and Lamb New Zealand Land and Environment Plan Level 1 and 2 or equivalent, and adopting industry-supported Good Management Practice.</p> <p>AND AMEND to ensure that low risk land users are able to continue as a permitted activity without the need to prepare a Farm Environment Plan.</p> <p>AND AMEND Rule 3.11.5.3 to be a Permitted Activity where a Farm Environment Plan is provided and REMOVE the requirement to be under a Certified Industry Scheme.</p> <p>AND AMEND to extend the timeframes required for Farm Environment Plans.</p> <p>AND AMEND to ensure that Farm Environment Plans adopt a tailored individual approach.</p> <p>AND WITHDRAW PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment.</p>		<p>FFNZ agrees that the resources reasonably available to the farm enterprise as well as the significance of any proposed investment in the property and in mitigations ought to be taken into account in FEPs.</p> <p>FFNZ supports providing the flexibility for low risk properties but does not support limiting this to stocking rates or other similar input controls.</p> <p>FFNZ considers that all farm enterprises over a certain size ought to prepare an FEP but that a simplified FEP ought to be provided for low nitrogen properties (or properties below a permitted baseline as set out in FFNZ's submission on Variation 1).</p> <p>FFNZ considers that there should be the option for farmers to choose to be part of a CIS or to obtain a controlled activity consent from Council or to be permitted if they meet the required standards (FFNZ refers further to its submission on Variation 1).</p> <p>FFNZ agrees that the timeframes in PC1 ought to be amended to reflect the two year delay since notification of PC1.</p> <p>FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities and also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain and requiring all stock to be excluded from all water bodies will impose significant cost for no net benefit.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND the timeframes for stock exclusion in Schedule C so that stock is excluded depending on the type of stock, the type of waterway stock is to be excluded from and the degree of slope.</p> <p>AND AMEND Schedule C to specify that slope means the dominant slope of the landscape. i.e. covers 80% or more of the landscape.</p> <p>AND AMEND so that where 80 percent of land is less than or equal to 15 degree slope, stock is excluded from perennial waterways by 2022.</p> <p>AND AMEND so that where 80 percent of land is less than or equal to 15 degree slope, stock is excluded from ephemeral waterways when they flow directly to a main waterway, accepting temporary fencing as a solution.</p> <p>AND AMEND to ensure stock exclusion occurs only in those areas identified as high risk,</p> <p>AND AMEND to ensure that in hill country, where dominant slope is greater than 15 degrees, stock exclusion occurs in critical source areas and where the cattle/deer stocking rate is greater than or equal to 1000kgLW/ha.</p> <p>AND AMEND to ensure the timeframes for stock exclusion align with those proposed nationally.</p> <p>AND AMEND to provide certainty</p>		<p>FFNZ supports a risk based or critical source area approach.</p> <p>FFNZ supports a tailored and proportionate FEP approach as opposed to a one size fits all or blanket approach or focusing on one contaminant.</p> <p>FFNZ supports a critical source area assessment in the FEPs that considers mitigations applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ does not support an alternative natural capital approach based on soils or live weights or pasture production capability or anything similar.</p> <p>FFNZ has concerns that if the approach was adopted such that the highest nitrogen discharges had to reduce that would not take into account their particular circumstances e.g. a good farm system on leaky soils or high rainfall could be twice the nitrogen number of a poor farm system on better soils and low rainfall. It is not necessarily the high nitrogen farm that should or is able to reduce.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>about where and which waters need to be excluded from stock. AND AMEND to ensure that Farm Environment Plans provide mitigation against contaminants relevant to each farm, rather than a blanket approach. AND AMEND to enable stock to enter water bodies if they are being actively managed across the water body, and the water body is not crossed more than once a week. AND ADOPT a sub-catchment approach to focus on contaminants important to each farm and sub-catchment. AND ENSURE Farm Environment Plans assess appropriate land use options for each farm, and encourage better science to determine which contaminants are of concern for each farm and sub-catchment. AND DELETE requirements to manage farming activities to a historic Nitrogen Reference Point AND REPLACE with live weight standards linked to the natural capital of soils, climate and assimilative capacity of water OR allocate nitrogen as it is tied to the natural capital of soils. AND ENSURE greater understanding about spatial location of natural resources is developed so this knowledge can be applied to better inform and manage contaminant loss.</p>		<p>FFNZ considers that funding and timeframes and/or a reasonable consenting process would need to be considered and available.</p> <p>FFNZ does not support a one size fits all approach that requires 10% reductions (or something similar). FFNZ considers that a tailored approach ought to be adopted.</p> <p>FFNZ agrees that the value of horticulture to the community ought to be recognised but that the same applies to all activities.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND or ADD new rules that are based on land class and pasture production capability, where land use is supported by the capability of the land giving rise to contaminant loss no greater than acceptable ecosystem health limits. OR ADOPT equal nitrogen allocation flexibility for all land users (at 20kgN/ha) as a permitted activity.</p> <p>AND DELETE 75th percentile nitrogen leaching value AND REPLACE with requirements and standards that ensure the reductions required in over-allocated catchments, and where nitrogen is an issue, are proportionate to the level of improvement required and the impact of the discharge. Highest dischargers should be targeted first and consideration should be given to the economic implications of reducing and the timeframe for making reductions.</p> <p>AND AMEND the rules to ensure low contaminant loss land uses are a permitted activity.</p> <p>AND AMEND to ensure that high nitrogen dischargers, except horticulture, are required to reduce over time, starting immediately, and achieving 10% reductions every year for the life of PPC1.</p> <p>AND AMEND to ensure horticultural nitrogen losses are managed in a</p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			manner that recognises the value of the industry to the community.		
Heritage New Zealand Pouhere Taonga Submitter ID: 68939	PC1-3092	Section 3.11.5: Rules	ADD to section 3.11.5 an advisory note ensuring that landowners implementing the provisions of PPC1 are aware of their obligations under the Heritage New Zealand Pouhere Taonga Act 2014 not to modify or destroy any archaeological site, whether recorded or not, without obtaining an authority (consent) from Heritage New Zealand.	Oppose in part	FFNZ is not sure that such an approach is within scope of PC1 or necessary.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10162	Section 3.11.5: Rules	ADD the following rule: <u>"Rule 3.11.5.X - Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective</u> <u>The management of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens onto or into land by a catchment collective in circumstances which may result in those contaminants entering water is a restricted discretionary activity (requiring resource consent).</u> <u>Waikato Regional Council restricts its discretion over the following matters:</u> <u>i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</u> <u>11. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</u>	Oppose	FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate and/or allocated contaminants (FFNZ does not support allocation). FFNZ is also concerned about the potential power to catchment collective, potential for abuse of that power and potential significant cost.

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			<p>iii. <u>Achieving the contaminant load reduction targets specified for each for sub-catchment in Schedule 1C Table XX</u></p> <p>iv. <u>The matter set out in Schedule 1C Catchment Collectives.</u></p> <p>v. <u>The term of the resource consent. Minimum 15 years.</u></p> <p>vi. <u>The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</u></p> <p>vii. <u>The timeframe and circumstances under which the consent conditions may be reviewed.</u></p> <p>viii. <u>The matters addressed by Schedules A and C and the Nitrogen Reference Point being:</u></p> <p>1. <u>In conformance with Schedule B;</u> <u>or</u> 2. <u>Determined through use of proxy farm systems to approximate the nitrogen reference for the catchment collective; or</u> 3. <u>Through modelling a series of collective mitigations that are estimated sufficient to meet the load limit targets, in accordance with the criteria in schedule 1C.</u></p> <p><u>Notification:</u> <u>Consent applications will be considered without notification, and without the need to obtain written approval of affected persons"</u></p>		
Jivan Produce Ltd	PC1-1356	Section 3.11.5:	Rules 3.11.5: ADD a NEW Restricted	Support in	FFNZ supports a more permissive consenting

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 71429		Rules	Discretionary Rule for change in land use in sub-catchments that cannot meet sub-catchment specific attribute targets. Relate this to diffuse discharges (effects based). AND AMEND PPC1 to reflect Primary Production as a Mana Tangata value AND AMEND rules within PPC1 to ensure that social, economic and cultural well-being is maintained in the long term AND AMEND the rules within PPC1 to enable tailored on farm management and collective sub-catchment management of all four contaminants, specific to the requirements of each sub-catchment and farm AND REMOVE the requirement for a Nitrogen Reference Point, unless a suitable alternative to the OVERSEER Model can be substantiated AND AMEND rules within Plan to reflect justifiable gains to made in 10 year period AND AMEND the rule framework to provide for off-setting within a commercial vegetable production enterprise.	part Oppose in part	regime for land use change and an effects based approach. FFNZ agrees that social, economic and cultural wellbeing needs to be provided for. FFNZ supports tailored FEPs but it does not support sub-catchment collectives managing contaminants for reasons including that this is likely to involve allocation (FFNZ does not support allocation), potentially gives significant power to catchment collectives, the potential for abuse of that power and the potential significant cost. FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance. FFNZ agrees that PC1 should be realistic to reflect the gains achievable in 10 years (whilst providing for social, economic and cultural wellbeing). In principle, FFNZ support offsetting.
J Swap Ltd Submitter ID: 71618	PC1-6565	Section 3.11.5: Rules	AMEND PPC1 to provide a NEW Controlled Activity Rule for renewals of resource consents associated with regionally significant industries (or relief to that effect) to recognise	Oppose in part	FFNZ considers that the consenting regime ought to reflect the nature of the activity and ensure an effective effects based approach that considers all relevant factors.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			current infrastructure investment and the level of treatment provided by Regionally significant industry under any existing resource consents, and applying a Best Practicable Option approach.		
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4464	Section 3.11.5: Rules	AMEND PPC1 to protect remaining wetlands and gully seeps and create new incentives to encourage the creation or reinstatement of wetland areas. AND RETAIN Rules 3.11.5.1 - 3.11.5.7	Oppose	FFNZ does not support a blanket approach to protecting all wetlands and gullies for reasons including that it is likely to impose significant cost for no net benefit. FFNZ instead supports a tailored and proportionate approach that considers critical source areas, sub-catchment characteristics and the resources reasonably available.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9333	Section 3.11.5: Rules	AMEND the heading of Rule 3.11.5 to read: "3.11.5 <u>Land Use</u> Rules/Nga Ture."	Oppose in part	FFNZ considers that it is likely to be appropriate to provide for hybrid section 9 and section 15 rules.
Matamata-Piako District Council Submitter ID: 73419	PC1-3693	Section 3.11.5: Rules	CONSIDER a review of Rules 3.11.5 to ensure they are understandable, robustly formulated, practical and able to be implemented by land owners and managers to achieve compliance and are enforceable by the regulator AND ENSURE collaboration with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes AND CONSIDER alternative approaches that incorporate the use of performance standards for the range of primary production activities	Support in part Oppose in part	FFNZ considers that the rules ought to be practical, understandable to all plan uses and implementable. FFNZ supports collaboration with all stakeholders and affected parties. FFNZ is concerned that the adoption of performance standards will not be sufficiently tailored to particular farm enterprises and will result in an input based approach which will likely impose significant cost for no net benefit.

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			that are able to establish as 'small and low intensity farming activities' (currently defined under Rules 3.11.5.1 and 3.11.5.2) throughout the region.		
Mercury NZ Limited Submitter ID: 73182	PC1-9598	Section 3.11.5: Rules	RETAIN Rules 3.11.5.1 to 3.11.5.7, and associated Schedules A, B and C, and Schedule 1 and 2.	Oppose	FFNZ considers that the rule framework will likely impose significant cost and over deliver on the desired water quality outcomes. FFNZ considers that significant amendment is required as set out in its submission on Variation 1.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-7704	Section 3.11.5: Rules	<p>AMEND 3.11.5 Rules by changing the implementation dates so that they take effect within 6 months of the release decisions pursuant to Clause 10 of Schedule 1 or any other appeals.</p> <p>ADD a NEW restricted discretionary activity - approval of certified scheme [in the submission referred to as Rule 8] to be based on the following concepts:</p> <p>A Certified Industry Scheme is a Restricted Discretionary Activity and is referred to as a 'Consented Industry Scheme'. The Applicant must lodge an application to be assessed against the criteria in Schedule 2.</p> <p>The Certified Industry Scheme must require certified participants to provide the following information:</p> <p>a. Information to be provided to Council (per Schedule B- (g))</p> <p>b. Information regarding compliance with standards to be provided on</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ would support amendments that provided more time for compliance or for rules to come into effect.</p> <p>FFNZ supports the CIS but is concerned that if it was required to obtain consent that this should be result in de facto allocation or delegation of powers to the CIS and should result in an outcome where farmers have a reasonable option of compliance with a permitted activity rule.</p>

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			<p>request (per modified 3.11.4.2 3 (c)) c. Overseer calculations to be provided (per clause 2(e)) of the Farm Environment Plan Schedule." AND ADD the matters of discretion for the New restricted discretionary activity - approval of certified scheme to include the following clause: <u>"The actions and timeframes for undertaking mitigation actions that maintain or reduce the diffuse discharges of activities nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water and whether those actions are likely to achieve the same or better reductions in those contaminants than the minimum standards provided under Rules 1, 4 and 5."</u> AND AMEND so the NEW rule is subject to full notification. If the alternative consent process for Certified Industry Scheme is not accepted then delete the NEW rule AND AMEND PPC1 to remove reference to Certified Industry Scheme</p>		
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7776	Section 3.11.5: Rules	REMOVE the capping of land area for vegetable growing under the Rules AND REMOVE the Nitrogen Reference Point AND ADOPT a sub-catchment	Support in part Oppose in part	FFNZ considers that some recognition of expansion for commercial vegetable growing ought to be provided in PC1. FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>approach to the management of diffuse discharges AND AMEND PPC1 Rules to reflect justifiable gains to be made in the 10 year period.</p>		<p>nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ supports an approach based on considering sub-catchment characteristics and tailored and proportionate actions in FEPs but not a sub-catchment collective approach if that involves allocating contaminants or delegating powers.</p> <p>FFNZ agrees that the 10 year targets ought to be realistic, achievable and provide for social, economic and cultural wellbeing.</p>
Raukawa Charitable Trust Submitter ID: 74073	PC1-10595	Section 3.11.5: Rules	AMEND the heading of Rule 3.11.5 to read: "3.11.5 <u>Land Use</u> Rules/Nga Ture."	Oppose in part	FFNZ considers that it is likely to be appropriate to provide for hybrid section 9 and section 15 rules.
Ravensdown Limited Submitter ID: 74058	PC1-10158	Section 3.11.5: Rules	<p>ADD a NEW Discretionary Activity Rule as follows: <u>"3.11.5.6B Discretionary Activity – The use of land for farming activities not provided elsewhere. The use of land for farming activities that do not meet the matters of discretion included in Rule 3.11.5.6 is a Discretionary Activity. Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected parties."</u> AND ADD a NEW Discretionary Activity Rule as follows:</p>	Support in part	FFNZ supports a discretionary activity rule provided the Rule 6 remains as an RDA and supports land use change being a discretionary activity. In principle, FFNZ supports an approach that considers overall water quality in a sub-catchment and not an approach that requires all contaminants to reduce.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>"3.11.5.6C Discretionary Activity Land use change consent applications by members of a Certified Industry Scheme that may result in an increase in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens but which does not result in an overall deterioration of water quality at the sub-catchment level due to mitigations adopted. Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected parties."</u>		
Rotorua Lakes Council Submitter ID: 73373	PC1-2520	Section 3.11.5: Rules	AMEND rules under 3.11.5 by changing the dates required for property registration, Farm Environment Plans and calculation of Nitrogen Reference Points so that a reasonable time is allowed following PPC1 becoming operative AND ANY consequential amendments.	Support in part	FFNZ agrees that the dates need to be amended and be reasonable, particularly in light of the two year delay following notification of PC1.
South Waikato District Council Submitter ID: 72892	PC1-4175	Section 3.11.5: Rules	AMEND Rules 3.11.5 to ensure they are understandable, robustly formulated, practical and able to be implemented by land owners and managers to achieve compliance and enforceable by the regulator. AND CONSIDER alternative approaches that incorporate the use of performance standards for the range of primary production activities that are able to establish as 'small	Support in part Oppose in part	FFNZ considers that the rules ought to be practical, understandable to all plan uses and implementable. FFNZ supports collaboration with all stakeholders and affected parties. FFNZ is concerned that the adoption of performance standards will not be sufficiently tailored to particular farm enterprises and will result in an input based approach which will likely impose significant cost for no net benefit.

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			and low intensity farming activities' (currently defined under Rules 3.11.5.1 and 3.11.5.2) throughout the region.		
Taupo District Council Submitter ID: 74207	PC1-8158	Section 3.11.5: Rules	AMEND to simplify the rules AND REMOVE provision of information requirement where the information is already held by the regional council.	Support	FFNZ considers that the rules ought to be practical, understandable to all plan uses and implementable.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11807	Section 3.11.5: Rules	AMEND the heading of Rule 3.11.5 to read: "3.11.5 <u>Land Use</u> Rules/Nga Ture."	Oppose in part	FFNZ considers that it is likely to be appropriate to provide for hybrid section 9 and section 15 rules.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8194	Section 3.11.5: Rules	AMEND the rules to remove the ambiguity surrounding the 75th percentile AND include the 75th percentile requirement in the rules, not in Schedule 1, AND AMEND matters of control (ii) and (iii) and clause 5(a) of Schedule 1 to make it clear that reductions are expected in accordance with Objective 3 and Policy 2, AND AMEND to adopt require good management practices by all landowners, AND AMEND to ensure that where reductions beyond good management practices are needed to achieve water quality, the rules provide for best management practices.	Oppose	<p>While FFNZ considers in principle that any ambiguity about the 75th percentile ought to be clarified (and FFNZ considers that the basis for FMUs and methodology for calculating the 75th percentile ought to be clarified as proposed in its submission on Variation 1, e.g. Method 3.11.4.13), FFNZ opposes the extension of the 75th percentile to other contaminants and considers that this will likely result in significant cost for not net benefit.</p> <p>FFNZ opposes a requirement to reduce all contaminants everywhere or amendments that result in the rules becoming more stringent.</p> <p>FFNZ oppose regulation requiring the adoption of GMP by all landowners and considers that a tailored critical source area assessment and assessment of mitigations using FFNZ's MPA framework is more appropriate (FFNZ refers to its submission on Variation 1).</p> <p>FFNZ does not support an obligation to adopt BMP</p>

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					and consider this standard is too high and will likely impose significant cost for no net benefit.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10475	Section 3.11.5: Rules	AMEND the heading of Rule 3.11.5 to read: "3.11.5 <u>Land Use</u> Rules/Nga Ture."	Oppose in part	FFNZ considers that it is likely to be appropriate to provide for hybrid section 9 and section 15 rules.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3520	Section 3.11.5: Rules	AMEND the heading of Rule 3.11.5 to read: "3.11.5 <u>Land Use</u> Rules/Nga Ture."	Oppose in part	FFNZ considers that it is likely to be appropriate to provide for hybrid section 9 and section 15 rules.
Waikato Environment Centre Submitter ID: 73436	PC1-6242	Section 3.11.5: Rules	ADD a NEW Rule to prevent over-fertilizing AND ADD a NEW Rule to prevent over-stocking AND ADD a NEW Rule to prevent over-grazing AND ADD a NEW Rule to prevent over-watering AND ADD a NEW Rule to prevent over-draining.	Oppose	FFNZ opposes rules based on input controls for reasons including that they do not provided for a tailored and proportionate approach and will likely result in significant cost for no net gain.
Waipa District Council Submitter ID: 67704	PC1-3166	Section 3.11.5: Rules	AMEND Rules 3.11.5 the dates required for property registration, preparation of farm Environment Plans and calculation of Nitrogen Reference Points so that a reasonable time is allowed following PPC1 becoming operative.	Support	FFNZ agrees that more time is required, particularly in light of the two year delay since notification of PC1.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11382	Section 3.11.5: Rules	ADD a NEW Rule 3.11.5.8 to read: " <u>Rule 3.11.5.8 - Permitted Activity Rule - Transfer of Discharge Permits pertaining to the merger of properties or enterprises to form an enterprise or to the split or break-up of an enterprise in the same sub-catchment</u>	Support in part	In principle, FFNZ supports an approach that provides flexibility to allow properties to be farmed as a single enterprise and provides for subdivision or addition of properties to that enterprise. FFNZ considers that a discharge permit would also like provide for crop rotation for commercial

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>The transfer of part or all of any resource consent for farming activities or commercial vegetable production and the associated diffuse discharge of contaminants granted pursuant to Rules 3.11.5.4 , 3.11.5.5 or 3.11.5.6 to another property or enterprise for another site is a permitted activity subject to the following conditions:</u></p> <p><u>1. The transfer does not worsen the actual or potential effect of any discharges on the environment; and</u></p> <p><u>2. The transfer does not result in any discharges that contravene a national environmental standard; and</u></p> <p><u>3. Both sites are in the same sub-catchment; and</u></p> <p><u>4. Written notice of the transfer is given to Waikato Regional Council; and</u></p> <p><u>5. A Farm Environment Plan or a sub-catchment management plan (as relevant) has been prepared in accordance with Schedule 1 or [new] Schedule 2 by the transferee."</u></p> <p>AND ADD a NEW Rule 3.11.5.9 to read:</p> <p><u>"Rule 3.11.5.9 - Controlled Activity Rule - Transfer of Discharge Permits pertaining to the merger of properties or enterprises to form an enterprise or to the split or break-up of an enterprise in the same Freshwater Management Unit</u></p>		vegetable growers.

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			<p>The transfer of part or all of any resource consent for farming activities or commercial vegetable production and the associated diffuse discharge of contaminants granted pursuant to Rules 3.11.5.4, 3.11.5.5 or 3.11.5.6 to another property or enterprise for another site is a controlled [activity] subject to the following conditions:</p> <p>1. The transfer does not worsen the actual or potential effect of any discharges on the environment; and</p> <p>2. The transfer does not result in any discharges that contravene a national environmental standard; and</p> <p>3. Both sites are in the same Freshwater Management Unit as defined by this Plan; and</p> <p>4. Written notice of the transfer is given to Waikato Regional Council; and</p> <p>5. A Farm Environment Plan or a Sub-catchment management plan (as relevant) has been prepared in accordance with Schedule 1 or [new] Schedule 2 by the transferee."</p>		
Waitomo District Council Submitter ID: 73688	PC1-10312	Section 3.11.5: Rules	<p>AMEND the Rules provisions to provide certainty for PPC1 users and for Council staff administering the provisions</p> <p>AND AMEND to ensure the provisions are clear, can be implemented and are enforceable</p> <p>AND AMEND the dates required for</p>	Support	<p>FFNZ agrees that the rules need to be reasonable, practical, understandable and implementable.</p> <p>FFNZ agrees that the timeframes ought to be extended, particularly in light of the two year delay since notification of PC1.</p> <p>FFNZ agrees that the NRP ought to be used as a</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>property registration, preparation of Farm Environment Plans and calculation of Nitrogen Reference Points to allow a reasonable amount of time following PPC1 becoming operative.</p> <p>AND AMEND the provisions specifying the Nitrogen Reference Point be calculated and not exceeded, and instead use the Nitrogen Reference Point as part of a Farm Environment Plan to inform mitigation measures.</p>		<p>reference point and not as a basis to grandparent or allocate nitrogen.</p>
<p>Alcock and Easton, Jo and John Submitter ID: 73374</p>	<p>PC1-9217</p>	<p>Rule 3.11.5.1</p>	<p>AMEND Rule 3.11.5.1 to ensure rule permitting low intensity land uses and other land uses are consistent with Policy 4 to provide for small and low intensity and low risk farming activities and to continue to be flexible</p> <p>AND AMEND to apply the National Waterway Accord recommendations to fence slopes up to 15 degrees</p> <p>AND AMEND to provide for stock exclusion requirements to only apply to all permanently flowing waterbodies 1m or greater to exclude cattle, horses, deer and pigs on less than 15 degrees slope</p> <p>AND AMEND to provide certainty on stock exclusion for the future</p> <p>AND AMEND to provide for Farm Environment Plans only in sub-catchments where science indicates</p>	<p>Support in part</p>	<p>FFNZ agrees that Rule 1 (or 2) ought to provide for low intensity and low risk farming activities to potentially intensify or sufficient flexibility to reflect the nature of their activities.</p> <p>FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities and also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain and requiring all stock to be excluded from all water bodies will impose significant cost for no net benefit.</p> <p>FFNZ supports all farmers obtaining FEPs but considers that a simplified FEP ought to be provided by low intensity activities (and refers further to FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that sufficient flexibility ought to be provided in FEPs and that amendments ought to be</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>improvements are required AND AMEND to ensure Farm Environment Plans are written to allow flexibility with nitrogen discharges and application of good management practices AND AMEND to ensure Farm Environment Plans are tailored to the individual properties and focus on critical source management rather than applying blanket regulatory standards AND AMEND to convene an independent panel to address points between staff and farmers in Farm Environment Plans without the cost of appeal to the Environment Court.</p>		<p>made to PC1 to provide for this (see FFNZ's submission on Variation 1 e.g. new Policies 2A and 2B).</p> <p>FFNZ supports tailored FEPs that focus on critical source areas and use MPA to assess appropriate mitigations (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.</p>
Aston, Lucy Submitter ID: 73020	PC1-7032	Rule 3.11.5.1	<p>AMEND to merge Rule 3.11.5.1 and 3.11.5.2 into the one rule AND AMEND Rule 3.11.5.1 to include as a Permitted Activity land uses with stocking rates at or below 18 stock units and enable the stocking rate to increase from current up to this standard, AND/OR relate to the natural capital of soils for sustainable production/farming AND DELETE standards which hold farmers to historic stocking rates of nitrogen discharges. AND AMEND PPC1 so that if nitrogen is to be allocated then this is done using land use capability as adopted in the Horizons and Hawkes Bay Regions.</p>	Support in part	<p>FFNZ supports an approach based on reasonable stock units. FFNZ considers that ought to be higher than 6 stock units but is concerned that 18 stock units may be too high.</p> <p>FFNZ opposes a management or allocation regime based on natural capital or soils for reasons including that there is no appropriate proxy at present for natural capital and FFNZ does not support allocation of contaminants.</p> <p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models,</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND DELETE the 6 stock unit standard from point 5 of Rule 3.11.5.1</p> <p>AND DELETE the 4.1 hectares provision from Rule 3.11.5.1 and provide for up to 20 hectares</p> <p>AND AMEND the riparian setback distances so they only apply to flat and rolling land and not hill country (ie slope > 15 degrees)</p> <p>AND AMEND the slope requirements to be no greater than 15 degrees in accordance with the Clean Water Report</p> <p>AND AMEND the stock exclusion timelines by lengthening them and give certainty to those with land classified at risk of erosion that it will not be converted to forestry in a future plan change.</p> <p>AND AMEND PPC1 to enable individual Farm Environment Plans to present farm specific mitigations against contaminants</p> <p>AND AMEND PPC1 to enable stock to enter waterbodies if they are being actively managed and the waterbody is not crossed by stock more than 3 times per week</p> <p>AND ADD new provisions that state that any waterway fencing be subsidised by the Waikato Regional Council and the regional communities, urban and rural, benefiting from improvements to the</p>		<p>changes in input standards and it is not used for enforcement and compliance.</p> <p>FFNZ does not support allocation on LUC or a similar basis to Horizons, which has failed.</p> <p>FFNZ considers that minimum standards for setbacks ought to be reasonable (and as proposed in FFNZ's submission on Variation 1) and that more stringent setbacks ought to be considered through a tailored FEP that identifies critical source areas and adopts FFNZ's MPA framework (and as proposed in FFNZ's submission on Variation 1).</p> <p>FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities and also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain and requiring all stock to be excluded from all water bodies will impose significant cost for no net benefit.</p> <p>FFNZ supports funding and incentives.</p> <p>FFNZ considers that all farm enterprises ought to obtain an FEP but that a simplified FEP ought to be required from low intensity activities (and as proposed in FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>waterways AND AMEND the Farm Environment Plan requirements so they are only required in sub-catchments where science indicates improvements are required AND AMEND PPC1 so that for Farm Environment Plans an independent panel is available to ensure accountability and enable contested points to be settled without appeals to the Environment Court AND AMEND the stock exclusion provisions of PPC1 to the standards recommended in the Clean Water Report (February 2017) AND AMEND the stock exclusion provisions of PPC1 so fencing is required above 15 degree slope for farming operations greater than 18su/ha AND AMEND PPC1 so mitigations are set on a farm by farm basis, focused on management of clearly identified and measurable 'critical source management areas' AND AMEND PPC1 so the rules are focused on reducing impacts from intensive agriculture greater than 18su/ha rather than applying blanket rules to all extensive agriculture AND AMEND the Farm Environment Plan requirements so they are produced by the landowner with Waikato Regional Council guidance</p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			and support. AND DELETE point 5(a) from Schedule 1. AND AMEND PPC1 so that there is flexibility in nitrogen leaching from hill country sheep and beef farming, and land uses which are low impact (at or below 20kgN/ha/yr for example or apply natural capital allocation) AND AMEND the timeframes to prepare Farm Environment Plans so they are set through consultation with the farmer taking into account the Waikato Regional Council subsidy available; the individual farmer's financial constraints; and the sensitivity of the waterbody to any impact		
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10996	Rule 3.11.5.1	RETAIN Rule 3.11.5.1.	Oppose in part	FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11501	Rule 3.11.5.1	AMEND Rule 3.11.5.1 to include a classification of small and low intensity farms up to 20 hectares, and to include enterprises being undertaken on more than 1 property. AND DELETE Rule 3.11.5.1 (3). AND DELETE Rule 3.11.5.1 (5).	Support in part	FFNZ supports providing a more reasonable activity status for low intensity farming activities and to provide for the activity to be spread over more than one property.
Cameron, Bruce Submitter ID: 60603	PC1-6386	Rule 3.11.5.1	RETAIN Rule 3.11.5.1. AND AMEND PPC1 so that cattle, horses, deer and pigs are excluded from water bodies in conformance	Support in part	FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			with Schedule C for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs. AND AMEND PPC1 to CLARIFY how/where to measure slope on undulating land.		FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities and also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain and requiring all stock to be excluded from all water bodies will impose significant cost for no net benefit.
Charion Investment Trust Submitter ID: 71344	PC1-7783	Rule 3.11.5.1	Rule 3.11.5.1: DELETE all the rules and schedules as appropriate to remove provisions for land use consent terms and conditions. AND RETAIN the use of rules for the control and reduction of nitrogen, phosphorous, sediment and microbial pathogens.	Oppose	FFNZ considers that the rules require significant amendment but supports a reasonable consenting regime, including the option for activities to be permitted through the CIS or a controlled activity via consent.
Christian and Anderson, Ashley John and Frances Ann Submitter ID: 73064	PC1-4774	Rule 3.11.5.1	Rule 3.11.5.1: AMEND PPC1 stock exclusion provisions to allow for stock to cross waterways if they are being actively controlled. Individual Farm Environment Plans to state how many time crossings are allowed. AND AMEND so individual Farm Environment Plans outline mitigations against contaminants specific to each farm, in-line with the Ministry for the Environment Draft Regulatory Impact Statement: stock exclusion. AND AMEND the definition of a waterway to that of the National Water Accord. AND AMEND to include a subsidy for waterway fencing. AND AMEND to allow grazing on	Support in part	FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities and also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain and requiring all stock to be excluded from all water bodies will impose significant cost for no net benefit. FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.

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			different contours, taking into account soil type, distance from waterbodies, climatic conditions, vegetative cover, type of stock, etc, to determine a stocking rate. This would be contained in the property's Farm Environment Plan which would break down the property into areas as per above and alter the stocking rate on each area.		
Clarke, Hamish Submitter ID: 71621	PC1-8461	Rule 3.11.5.1	AMEND Rule 3.11.5.1 to be consistent with Policy 4, and enable small, low intensity and low risk farming activities to continue or be established, and to be flexible AND AMEND by incorporating Rules 3.11.5.1 and 3.11.5.2 into one rule AND AMEND to include as a Permitted Activity land uses with stocking rates relative to the species and class of animal AND AMEND to include as a Permitted Activity stocking rate limits which are based on soil and geology AND AMEND to set nitrogen loading limits which are based on soil and geology AND AMEND to enable flexibility in land use, discharges and stocking rates up to these standards AND DELETE any standards or clauses which hold land uses to historic discharge levels or stocking rates AND DELETE the 4.1 hectares limit	Support in part	<p>FFNZ supports a reasonable permitted activity that provides for low intensity farm activities (and refers to its submission on Variation 1).</p> <p>FFNZ considers that stocking rates ought to be reasonable and it may be appropriate to base this on particular characteristics provided that this does not result in allocation or input controls.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.</p>

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			<p>and provide for up to 20 hectares AND DELETE the 6 stock unit standard AND AMEND PPC1 to apply national stock exclusion requirements which relate to the exclusion of cattle, deer, horses and pigs from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat and rolling land, but not on hill country AND DELETE in their entirety Rule 3.11.5.1 provisions which relate to excluding cattle from waterbodies through permanent fencing OR, if not deleted, AMEND Rule 3.11.5.1 so that exclusion of livestock (particularly deer and cattle) through permanent fencing is tailored on a farm by farm, district by district, and sub-catchment by sub-catchment basis, and where scientifically proven and identified water quality issues are directly created by specified classes of stock having access to water bodies AND AMEND to specifically address the output issue of water quality AND AMEND Farm Environment Plans to focus on addressing actual risks and be targeted at critical point source areas on farms, rather than requiring blanket stock exclusion AND AMEND to enable mustering of</p>		

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			cattle and deer through water bodies without requiring formed stock crossing structures when crossing that specific water body less than three times weekly.		
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10797	Rule 3.11.5.1	RETAIN Rule 3.11.5.1 as written.	Oppose in part	FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.
Craig, Jeffery Submitter ID: 73072	PC1-9689	Rule 3.11.5.1	AMEND Rule 3.11.5.1 to determine stock exclusion fencing requirements on an individual farm basis, taking other mitigation measures into account AND AMEND to exclude small waterways from fencing requirements, with a minimum width and depth for fencing AND AMEND to extend the timeframe for fencing AND AMEND to clarify how slope is measured AND AMEND to clarify how land within setbacks is to be maintained and funded, with consideration of Council-subsidised planting and spraying programmes AND AMEND to determine stock crossing requirements on an individual farm basis, with no culvert crossing required when stock crossing is infrequent AND AMEND to plan for the removal of carp	Support in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation. FFNZ supports the availability of funding and consideration of the resource reasonably available to the farm enterprise, considers that removal of carp ought to be undertaken and that practical things like drain cleaning ought to be provided for.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to ensure drains are still able to be cleaned AND AMEND to provide for Council to fund fencing and associated costs.		
Farmers 4 Positive Change (F4PC) Submitter ID: 73355	PC1-10424	Rule 3.11.5.1	AMEND to consolidate Rules 3.11.5.1 and 3.11.5.2 into one rule AND AMEND to allow as Permitted Activity land uses with stocking rates at or below 18 stock units and enable stocking rates to increase from current up to this rate, subject to land suitability AND AMEND to relate stocking rate to soil and geology, with 20 stock units on Land Use Capability class I, II or III; 18 stock units on class IV or V; 10 stock units on class VI or VII AND DELETE the 6 stock unit standard AND REPLACE the 4.1 hectare limit and provide for up to 20 hectares AND AMEND to align with national stock exclusion requirements which relate to exclusion of cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat land and rolling land, but not on hill country AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards AND REMOVE any standards or clauses which hold land uses to	Support in part Oppose in part	In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues. In particular, FFNZ considers that a stock unit approach could have merit as opposed to a land area or nitrogen threshold approach. FFNZ opposes relating the stocking rate to soil and geology on the basis of LUC as proposed. This is for reasons including that it is effectively allocation, FFNZ does not support allocation, FFNZ considers LUC is not a proxy for nitrogen and FFNZ is concerned about the robustness of the stocking rate measures that underpin LUC or about the robustness of the use of LUC for anything other than one of the available on farm decision support tools. FFNZ agrees that the stock exclusion requirements need to be amended but considers that they ought to be aligned with a stocking rate (to reflect intensity) and accord water bodies as set out in FFNZ's submission on Variation 1. FFNZ supports the NRP as long as it is used as a

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			historic discharge levels or stocking rates AND AMEND riparian setback distances so they only apply to flat and rolling land and not to hill country (i.e. on slopes over 15 degrees).		reference point and not to grandparent nitrogen. FFNZ considers that riparian setbacks ought to be considered in the context of tailored FEPs.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10618	Rule 3.11.5.1	AMEND Rule 3.11.5.1 to refer to a schedule which is introduced to PPC1 to provide contaminant loss levels which are considered acceptable to provide for permitted activities, and correlate the acceptable loss thresholds to the simple input parameters listed in rule 3.11.5.1 AND AMEND Rule 3.11.5.1 to ensure that for a property which is greater than 4.1 hectares, any input limit for a permitted activity should be directly correlated to the acceptable contaminant loss threshold it represents.	Oppose	FFNZ is concerned that a schedule setting out contaminant loss levels for permitted activities is akin to an allocation approach and opposes this. FFNZ is concerned that this would result in a “one size fits all” approach that is not tailored for the particular situation and is likely to impose significant cost for no net benefit. FFNZ considers that it is premature to allocate contaminant loss levels into property level thresholds or to input standards (which are likely to be inflexible and impose significant cost).
Gaudin, Philip and Pauline Submitter ID: 72820	PC1-9082	Rule 3.11.5.1	AMEND to incorporate Rules 3.11.5.1 and 3.11.5.2 into one rule AND AMEND to include land uses with stocking rates at or below 18 stock units as Permitted Activity and enable stocking rates to increase from current up to this standard AND/OR AMEND to relate stocking rate and/or nitrogen discharge to the natural capital of soils for sustainable production AND DELETE the 6 stock unit standard provision	Support in part Oppose in part	In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues. In particular, FFNZ considers that a stock unit approach could have merit as opposed to a land area or nitrogen threshold approach.

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			<p>AND DELETE the 4.1 hectare threshold and replace it with up to 20 hectares</p> <p>AND AMEND to apply the national stock exclusion requirements which relate to exclusion of cattle, deer and pigs from permanently flowing waterbodies, through fencing on flat and rolling land but not on hill country</p> <p>AND AMEND to enable flexibility in land use, discharges and stocking rates up to these standards</p> <p>AND DELETE any standards or clauses which hold land uses to historic discharge levels or stocking rates</p> <p>AND AMEND to apply riparian setback distances only to flat and rolling land and not to hill country (i.e. slope > 15 degrees)</p> <p>AMEND to provide for stock exclusion slope requirements to be no greater than 15 degrees as per the Clean Water Report (February 2017)</p> <p>AND AMEND the exclusion requirements for cattle on land between 3 and 15 degrees slope to only apply to all permanently flowing waterways greater than 1m wide</p> <p>AND AMEND to ensure Farm Environment Plans form the basis of PPC1</p> <p>AND AMEND to ensure Waikato Regional Council and central</p>		<p>However, FFNZ opposes relating the stocking rate to natural capital of soils as proposed. This is for reasons including that it is effectively allocation, FFNZ does not support allocation, FFNZ considers LUC is not a proxy for nitrogen (and there is no other suitable proxy for natural capital at present) and FFNZ is concerned about the robustness of the stocking rate measures that underpin LUC or about the robustness of the use of LUC for anything other than one of the available on farm decision support tools.</p> <p>FFNZ agrees that the stock exclusion requirements need to be amended but considers that they ought to be aligned with a stocking rate (to reflect intensity) and accord water bodies as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports the NRP as long as it is used as a reference point and not to grandparent nitrogen. FFNZ considers that flexibility ought to be provided for low intensity farming activities to increase nitrogen as a permitted activity (in its submission on Variation 1, FFNZ proposes that this threshold is set at 15kgN or an alternative reasonable "permitted baseline").</p> <p>FFNZ considers that riparian setbacks ought to be considered in the context of tailored FEPs.</p> <p>FFNZ supports the availability of funding and consideration of the resource reasonably available to the farm enterprise and tailored FEPs that target the contaminants that are an issue.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>government continue to subsidise any waterway fencing AND AMEND to ensure actively managing stock across waterways be allowed but limited. AND AMEND to use the Clean Water Report (February 2017) for stock exclusion rules AND AMEND to ensure the rules focus on reducing impacts from intensive agriculture and not penalising extensive agriculture AND AMEND to remove timeframes and individualise them through consultation with farmers AND AMEND to enable farmers to be in charge of their own Farm Environment Plans, with input from Waikato Regional Council.</p>		<p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p>
Glenshee Trust Submitter ID: 73028	PC1-1942	Rule 3.11.5.1	<p>AMEND Rule 3.11.5.1 stock exclusion provisions by considering in depth the implications of stock exclusion on steeper and more extensive hill country AND AMEND stock exclusion provisions by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority AND AMEND stock exclusion provisions by giving consideration to alternative solutions on steep land such as water reticulation installation AND AMEND stock exclusion</p>	<p>Support in part Oppose in part</p>	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			provisions by giving consideration to matching land use capability rather than directly to slope which is a simplistic measure AND AMEND Farm Environment Plan provisions by providing an industry wide capability assessment to assess who will complete Farm Environment Plans AND AMEND Farm Environment Plan provisions to showing land owners and the industry how these are to be constructed and how the gains are quantified AND AMEND by providing clarity as to how the monitoring of Farm Environment Plans will be undertaken and who will pay for this before landowners commitment to this.		FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5770	Rule 3.11.5.1	RETAIN Rule 3.11.5.1 OR amalgamate with Rule 3.11.5.2.	Oppose in part	FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.
Hansen, Michael Submitter ID: 73151	PC1-10342	Rule 3.11.5.1	AMEND to combine Rules 3.11.5.1 and 3.11.5.2 into one rule AND DELETE Rule 3.11.5.1. 5. the 6 stock unit per hectare standard AND AMEND to include as Permitted Activity land uses with stocking rates at or below 18 stock units and enable stocking rates to increase from current up to this standard, AND/OR AMEND to relate stocking rate and/or nitrogen discharge to the natural	Support in part Oppose in part	In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues. In particular, FFNZ considers that a stock unit approach could have merit as opposed to a land

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>capital of soils for sustainable production/ sustainable farming AND AMEND to apply the national stock exclusion requirements which relate to exclusion of cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat land and rolling land, but not on hill country AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards AND DELETE any standards or clauses which hold land uses to historic discharge levels or stocking rates AND AMEND riparian setback distances so they only apply to flat and rolling land and not to hill country (i.e. on slopes greater than or equal to 15 degrees). AND AMEND the stock exclusion requirements to be consistent with the government's Clean Water Report (February 2017) AND AMEND the stock exclusion slope requirements to no greater than 15 degrees as per the Clean Water Report (February 2017) AND AMEND the stock exclusion requirements for cattle and deer on land between 3 and 15 degree slopes so that they apply only to all</p>		<p>area or nitrogen threshold approach.</p> <p>However, FFNZ opposes relating the stocking rate to natural capital of soils as proposed. This is for reasons including that it is effectively allocation, FFNZ does not support allocation, FFNZ considers LUC is not a proxy for nitrogen (and there is no other suitable proxy for natural capital at present) and FFNZ is concerned about the robustness of the stocking rate measures that underpin LUC or about the robustness of the use of LUC for anything other than one of the available on farm decision support tools.</p> <p>FFNZ agrees that the stock exclusion requirements need to be amended but considers that they ought to be aligned with a stocking rate (to reflect intensity) and accord water bodies as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports the NRP as long as it is used as a reference point and not to grandparent nitrogen. FFNZ considers that flexibility ought to be provided for low intensity farming activities to increase nitrogen as a permitted activity (in its submission on Variation 1, FFNZ proposes that this threshold is set at 15kgN or an alternative reasonable "permitted baseline").</p> <p>FFNZ considers that riparian setbacks ought to be considered in the context of tailored FEPs.</p> <p>FFNZ supports the availability of funding and consideration of the resource reasonably available to the farm enterprise and tailored FEPs that target</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>permanently flowing waterbodies 1 metre wide or greater AND AMEND Farm Environment Plan requirements to align the thresholds for mandatory stock exclusion to the nationally recommended standards (Clean Water Report February 2017), so that stock exclusion only applies up to a slope of 15 degrees for deer and cattle and only applies to waterbodies 1 metre or wider for deer and cattle on land between 3 and 15 degrees slope AND AMEND the Farm Environment Plan requirements so that stock exclusion fencing is required above the 15 degree threshold for intensive farming operations (>18su/ha), for example winter cropping and strip grazing of dairy cows on hill country AND REPLACE the [Farm Environment Plan and relevant provisions] input standards (such as riparian setbacks and limitations on cultivation) with mitigations set on a farm by farm basis and focused on management of critical source areas AND AMEND the rules to focus on reducing impacts from intensive agriculture >18su/ha rather than on extensive agriculture AND AMEND so that Farm Environment Plans are produced by the landowner with Council guidance</p>		<p>the contaminants that are an issue.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			and support AND DELETE Schedule 1(A)(5)(a) AND REPLACE with an approach that enables flexibility in nitrogen leaching from hill country sheep and beef farming, and land uses which are low impact (at or below 20kgN/ha/yr) OR apply natural capital allocation AND REMOVE the timeframes, AND REPLACE with an approach that sets timeframes through consultation with the farmer taking into account their financial constraints and the sensitivity of the waterbody to any impact.		
Hill Country Farmers Group Submitter ID: 73321	PC1-7840	Rule 3.11.5.1	AMEND Rule 3.11.5.1 2 to read: "2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u> ; and..." AND CLARIFY what constitutes slope on land where topography is varied and portions of the slope are both under and over the 15 degree threshold.	Support in part	FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities (e.g. break feeding) and also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain and requiring all stock to be excluded from all water bodies will impose significant cost for no net benefit.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10116	Rule 3.11.5.1	RETAIN Rule 3.11.5.1.	Oppose in part	FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.
Hurley, Peter James	PC1-1088	Rule 3.11.5.1	AMEND Rule 3.11.5.1 Permitted Activity Rules: to ensure consistency	Support in part	FFNZ agrees that rules 1 and 2 ought to be provide reasonable flexibility for low intensity farming

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 71391			<p>with Policy 4. AND AMEND to enable small, low intensity and low-risk farming activities to continue to exist, to establish, and are enabled to be flexible. AND AMEND so that Rule 3.11.5.1 and Rule 3.11.5.2 are incorporated into one rule. AND AMEND to include as a permitted activity land uses with stocking rates at or below 18 stock units and enable stocking rate to increase from current up to this standard; AND OR AMEND to relate soil and geology ie LUC I, II, III 20 stocking units, LUC IV, V 18 stock units; LUC VI, VII 16 stock units; AND OR AMEND LUC I 25kg/N/ha/yr, LUC II 20kg/N/ha/yr, LUC III 18kg/N/ha/yr, LUC IV 16kg/N/ha/yr, LUC V 12kg/N/ha/yr, LUC VI 10kg/N/ha/yr, LUC VII 8kg/N/ha/yr (or viable alternative); AND DELETE 6 stock unit standard; AND DELETE 4.1ha and provide for up to 20ha: AND AMEND to apply national stock exclusion requirements which relate to the exclusion of stock from water bodies through fencing flat and rolling land but not hill country. AND AMEND to enable flexibility in land use, discharges, and stocking</p>	Oppose in part	<p>activities to continue and to increase nitrogen. FFNZ proposes in its submission on Variation 1 that this ought to be on the basis of 15kgN for Rule 2 or some other reasonable “permitted baseline.”</p> <p>In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching.</p> <p>FFNZ opposes relating the stocking rate to soil and geology on the basis of LUC as proposed. This is for reasons including that it is effectively allocation, FFNZ does not support allocation, FFNZ considers LUC is not a proxy for nitrogen and FFNZ is concerned about the robustness of the stocking rate measures that underpin LUC or about the robustness of the use of LUC for anything other than one of the available on farm decision support tools.</p> <p>FFNZ supports the NRP as long as it is used as a reference point and not to grandparent nitrogen. FFNZ considers that flexibility ought to be provided</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>rates up to the above standards. AND DELETE any standards or clauses which hold land uses to historic discharge levels or stocking rates. AND MAKE any consequential amendments. Stock Exclusion: DELETE provisions that relate to excluding cattle from water bodies through permanent fencing in their entirety. OR, if not deleted in their entirety AMEND so that the requirement to exclude cattle through permanent fencing is tailored on a farm by farm basis where there is a proven water quality issue in relation to stock access to water bodies. Allow flexibility to provide for alternative approaches to achieve the same outcome. AND MAKE any consequential amendments.</p>		<p>for low intensity farming activities to increase nitrogen as a permitted activity (in its submission on Variation 1, FFNZ proposes that this threshold is set at 15kgN or an alternative reasonable “permitted baseline”).</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ’s submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>
<p>Kent and Gilbert, Elliot and Heather Submitter ID: 72891</p>	<p>PC1-6200</p>	<p>Rule 3.11.5.1</p>	<p>AMEND Rule 3.11.5.1 Farm Environment Plan timeframes to enable compliance. AND AMEND so that Farm Environment Plans should allow for mitigation against contaminants. AND WITHDRAW AND NOTIFY once the scientific data around which contaminants are causing water quality decline is available for each sub-catchment.</p>	<p>Support in part Oppose in part</p>	<p>FFNZ agrees that the timeframes need to be amended, particularly in light of the two year delay following notification of PC1. FFNZ agrees that PC1 ought to be based on robust science and that more information is required and that information gaps ought to be identified and addressed during the 10 year period.</p> <p>FFNZ considers that stock exclusion ought to be based on 18 stock units per hectare or a narrative approach that captures high intensity activities and</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND the definition of a waterway for stock exclusion to that of the National Water Accord.</p> <p>AND AMEND the slope requirements for stock exclusion to 15 degrees as per the National Water Accord.</p> <p>AND AMEND to extend the timeframes for stock exclusion and give certainty to landowners with land classed as 6+ that future plan changes will not make investment in fencing a waste of money and resources.</p> <p>AND AMEND so that individual Farm Environment Plan present mitigations against contaminants, relevant to each farm.</p> <p>AND AMEND to provide subsidies for stock exclusion fencing by Waikato Regional Council waterway.</p> <p>AND AMEND to enable stock to enter a waterbody if they are actively managed when crossing the waterbody and the waterbody is not crossed by stock more than 3 times a week.</p> <p>AND AMEND to clarify how a slope for stock exclusion will be classed.</p>		<p>also based on accord water bodies or something similar for reasons including that a slope criteria is too uncertain and requiring all stock to be excluded from all water bodies will impose significant cost for no net benefit.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports the availability of funding and consideration of the resource reasonably available to the farm enterprise.</p>
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9334	Rule 3.11.5.1	RETAIN Rule 3.11.5.1.	Oppose in part	FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.
Matamata-Piako District Council Submitter ID:	PC1-3694	Rule 3.11.5.1	AMEND Rule 3.11.5.1(4) to read as follows: "4. The farming activities do not form part of an enterprise being	Support in part	FFNZ agrees that Rule 1 could be amended to clarify the area it applies to and that grazed land could be refined to land that is fenced and in

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
73419			<p>undertaken on more than one property <u>within the Waikato River and or Waipā River catchments.</u>"</p> <p>AND AMEND Rule 3.11.5.1(5) to clarify the meaning of the term 'grazed land' to mean "<u>land that is fenced and in pasture throughout most or all of the year</u>"</p> <p>AND work with sector groups to determine a realistic threshold to apply as a performance standard for a permitted activity</p> <p>AND CONFIRM that the preferred approach meets the section 32 efficiency and effectiveness tests, otherwise delete the standard</p> <p>AND AMEND Rule 3.11.5.1(7) to read as follows: "7. The farming activities do not form part of an enterprise being undertaken on more than one property <u>within the Waikato River and or Waipā River catchments.</u>"</p>		<p>pasture. There should be no requirement to fence this land. Alternatively, if there is a clearer and more reasonable, practical and affordable way of defining "grazed land" FFNZ would support such and approach.</p>
McGregor, Colin Grant Submitter ID: 73534	PC1-6653	Rule 3.11.5.1	<p>AMEND Rule 3.11.5.1 to be consistent with Policy 4 and enable small and low intensity and low risk farming activities to continue if existing, be established and be flexible</p> <p>AND AMEND to merge Rule 3.11.5.1 and 3.11.5.2 into one rule</p> <p>AND AMEND to include as a Permitted Activity land uses with stocking rates at or below 18 stock units and enable the stocking rate to</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that rules 1 and 2 ought to be provide reasonable flexibility for low intensity farming activities to continue and to increase nitrogen. FFNZ proposes in its submission on Variation 1 that this ought to be on the basis of 15kgN for Rule 2 or some other reasonable "permitted baseline."</p> <p>In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>increase from current up to this standard OR AMEND to relate stocking rates to soil and geology, ie 20 stock units for Land Use Capability classes 1, 2 and 3; 18 stock units for Land Use Capability class 4; and 16 stock units for Land Use Capability class 6 or 7 OR AMEND to set nitrogen loading limits such as 25kg/N/ha/yr for Land Use Capability class 1; 20kg/N/ha/yr for Land Use Capability class 2; 18kg/N/ha/yr for Land Use Capability class 3; 16kg/N/ha/yr for Land Use Capability class 4; 12kg/N/ha/yr for Land Use Capability class 5; 10kg/N/ha/yr for Land Use Capability class 6; and 8kg/N/ha/yr for Land Use Capability class 7 (or viable alternatives) AND DELETE the 6 stock unit standard AND DELETE the 4.1 hectares limit and provide for up to 20 hectares AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards AND DELETE any standards or clauses which hold land uses to historic discharges levels or stocking rates AND AMEND PPC1 to apply national stock exclusion requirements which relate to exclusion of cattle, deer and pigs from permanently flowing</p>		<p>that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching.</p> <p>FFNZ opposes relating the stocking rate to soil and geology on the basis of LUC as proposed. This is for reasons including that it is effectively allocation, FFNZ does not support allocation, FFNZ considers LUC is not a proxy for nitrogen and FFNZ is concerned about the robustness of the stocking rate measures that underpin LUC or about the robustness of the use of LUC for anything other than one of the available on farm decision support tools.</p> <p>FFNZ supports the NRP as long as it is used as a reference point and not to grandparent nitrogen. FFNZ considers that flexibility ought to be provided for low intensity farming activities to increase nitrogen as a permitted activity (in its submission on Variation 1, FFNZ proposes that this threshold is set at 15kgN or an alternative reasonable “permitted baseline”).</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>waterbodies, through fencing (temporary and permanent or natural barrier or other technologies) on flat land and rolling land but not on hill country AND AMEND riparian setback distances so they only apply to flat and rolling land and not hill country (ie slope <= 15 degrees) AND DELETE the requirements in Rule 3.11.5.1 relating to excluding cattle from waterbodies through permanent fencing AND AMEND Rule 3.11.5.1 so, where there is a scientifically proven water quality issue related to stock access to waterbodies, the requirement to exclude cattle through permanent fencing is tailored on a farm by farm, district by district and sub-catchment basis, ensuring flexibility to provide for alternative management arrangements for certain land uses and terrains to achieve the same outcome AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less</p>		<p>affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

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Murphy, William S Submitter ID: 72105	PC1-6465	Rule 3.11.5.1	<p>than three times per week.</p> <p>AMEND Rule 3.11.5.1 to be consistent with Policy 4 and enable small and low intensity and low risk farming activities to continue if existing, be established and be flexible</p> <p>AND AMEND to merge Rule 3.11.5.1 and 3.11.5.2 into one rule</p> <p>AND AMEND to include as a Permitted Activity land uses with stocking rates at or below 18 stock units and enable the stocking rate to increase from current up to this standard</p> <p>OR AMEND to relate stocking rates to soil and geology, ie 20 stock units for Land Use Capability classes 1, 2 and 3; 18 stock units for Land Use Capability class 4; and 16 stock units for Land Use Capability class 6 or 7</p> <p>OR AMEND to set nitrogen loading limits such as 25kg/N/ha/yr for Land Use Capability class 1; 20kg/N/ha/yr for Land Use Capability class 2; 18kg/N/ha/yr for Land Use Capability class 3; 16kg/N/ha/yr for Land Use Capability class 4; 12kg/N/ha/yr for Land Use Capability class 5; 10kg/N/ha/yr for Land Use Capability class 6; and 8kg/N/ha/yr for Land Use Capability class 7 (or viable alternatives)</p> <p>AND DELETE the 6 stock unit standard</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that rules 1 and 2 ought to be provide reasonable flexibility for low intensity farming activities to continue and to increase nitrogen. FFNZ proposes in its submission on Variation 1 that this ought to be on the basis of 15kgN for Rule 2 or some other reasonable “permitted baseline.”</p> <p>In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching.</p> <p>FFNZ opposes relating the stocking rate to soil and geology on the basis of LUC as proposed. This is for reasons including that it is effectively allocation, FFNZ does not support allocation, FFNZ considers LUC is not a proxy for nitrogen and FFNZ is concerned about the robustness of the stocking rate measures that underpin LUC or about the robustness of the use of LUC for anything other than one of the available on farm decision support tools.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND DELETE the 4.1 hectares limit and provide for up to 20 hectares AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards AND DELETE any standards or clauses which hold land uses to historic discharges levels or stocking rates AND AMEND PPC1 to apply national stock exclusion requirements which relate to exclusion of cattle, deer and pigs from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier or other technologies) on flat land and rolling land but not on hill country AND AMEND riparian setback distances so they only apply to flat and rolling land and not hill country (ie slope <= 15 degrees) AND DELETE the requirements in Rule 3.11.5.1 relating to excluding cattle from waterbodies through permanent fencing AND AMEND Rule 3.11.5.1 so, where there is a scientifically proven water quality issue related to stock access to waterbodies, the requirement to exclude cattle through permanent fencing is tailored on a farm by farm, district by district and sub-catchment basis, ensuring flexibility to provide for alternative</p>		<p>FFNZ supports the NRP as long as it is used as a reference point and not to grandparent nitrogen. FFNZ considers that flexibility ought to be provided for low intensity farming activities to increase nitrogen as a permitted activity (in its submission on Variation 1, FFNZ proposes that this threshold is set at 15kgN or an alternative reasonable “permitted baseline”).</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ’s submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			management arrangements for certain land uses and terrains to achieve the same outcome AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week.		
Nelson Farms Partnership Submitter ID: 73054	PC1-8746	Rule 3.11.5.1	AMEND Rule 3.11.5.1 stock exclusion requirements to be consistent with the Clean Water Report (February 2017) AND AMEND to exclude stock from permanently flowing waterbodies on flat and rolling land, but not on hill country (slope >15 degrees) AND AMEND riparian setback distances to only apply to flat and rolling land, but not hill country (slope >15 degrees) AND AMEND to require exclusion of cattle and deer on slopes between 3 and 15 degrees only where there are permanently flowing waterbodies 1m wide or greater AND AMEND to extend the timeframes and give certainty for land with high erosion risk to ensure investment in fencing is not wasted if	Support in part	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports an approach based on considering FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility ought to be</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>future plan changes require retirement to forestry AND AMEND to allow Farm Environment Plans to provide mitigations against contaminants relevant to each farm, rather than a blanket approach AND DELETE any provisions that hold land use to historic discharge levels or stocking rates AMEND the Rule 3.11.5.1 Farm Environment Plan requirements to reduce the thresholds for mandatory stock exclusion to nationally recommended standards (Clean Water Report, February 2017, with stock exclusion only applying to slopes of up to 15 degrees for deer and cattle, and only applying to waterbodies 1m or wider for cattle and deer on land between 3 and 15 degrees slope AND RETAIN the requirement for fencing on land above 15 degrees for intensive farming operations (>18su/ha) AND REPLACE input standards such as riparian setbacks and limitation on cultivation with mitigations that are set on a farm by farm basis and focused on management of critical source areas AND AMEND to focus on reducing impacts from intensive agriculture (>18su/ha) rather than</p>		<p>provided for low nitrogen discharge activities to increase to either 15kgN or some other appropriate “permitted baseline” (and FFNZ refers to its submission on Variation 1).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>applying inappropriate rules to extensive agriculture AND AMEND to allow landowners to produce their own Farm Environment Plans with guidance and support from Waikato Regional Council AND DELETE Nitrogen Reference Point discharge restrictions and enable flexibility in nitrogen leaching from hill country sheep and beef farming and low impact land uses (< 20kgN/ha/yr) or apply a natural capital allocation AND DELETE the timeframes and set individual timeframes based on consultation with landowners and the sensitivity of the waterbody.</p>		
<p>New Zealand Pork Industry Board Submitter ID: 73780</p>	<p>PC1-4637</p>	<p>Rule 3.11.5.1</p>	<p>AMEND Rule 3.11.5.1 the Definition of Stock Unit by adding a row in the Table as follows: Stock class "Pig," Number of Stock Units per animal "<u>17 total breeding animals/ha for a dedicated pig farm with no rotation; 21 total breeding animals/ha for a pig unit on a pastoral farm with a rotation every 2 years (minimum of 2 year return period); 24 total breeding animals/ha for a pig unit on a pastoral farm with a rotation every year (minimum of 1 year return period); 32 total breeding animals/ha for a pig unit on an arable farm with a rotation at least every 2 years (minimum of 2 year return period).</u>" Animal performance definition "<u>Not</u></p>	<p>Support in part</p>	<p>For the purposes of assessing the stock units for Rule 1, FFNZ would support any reasonable and appropriate basis for defining pig stock units provided they do not impose unreasonable cost for no net benefit.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			applicable".		
Ngati Haua Tribal Trust Submitter ID: 73025	PC1-1976	Rule 3.11.5.1	AMEND Rule 3.11.5.1 Stock Exclusion to address the implications of stock exclusion on steeper and more extensive hill country. AND AMEND by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority. AND AMEND to consider alternative solutions on steep land such as water reticulation installation. AND AMEND to match land use capability rather than directly to slope. A CONSIDER undertaking an industry wide capability assessment to assess who will complete the plans. AND AMEND to show land owners and the industry how these are to be constructed and how the gains are quantified. AND AMEND to provide clarity as to how the monitoring of these plans will be undertaken and who will pay for this.	Support in part Oppose in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation. FFNZ opposes relating the stocking rate to soil and geology on the basis of LUC or some other approach to attempt to match land use and stocking rate with capability. This is for reasons including that it is effectively allocation, FFNZ does not support allocation, FFNZ considers LUC is not a proxy for nitrogen (and there is no proxy at present for land capability or natural capital) and FFNZ is concerned about the robustness of the stocking rate measures that underpin LUC or about the robustness of the use of LUC for anything other than one of the available on farm decision support tools.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8081	Rule 3.11.5.1	AMEND Rule 3.11.5.1 so that Certified Industry Schemes must obtain resource consent. AND AMEND Rule 3.11.5.1 [alternative approach - Rule 1 permitted activity small and low	Oppose	FFNZ does not agree that CIS ought to obtain resource consent and considers that they ought to be addressed through appropriate standards and/or certification through the provisions in PC1. FFNZ considers that the stock exclusion

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>intensity farming] to read: "...The use of land for farming activities <u>less than 20 ha</u> and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a permitted activity subject to the following conditions: 1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. Cattle, horses, deer and pigs <u>Livestock (not including sheep)</u> are excluded from water bodies in conformance with Schedule C; and Either 3. The property area is less than or equal to 4.1 hectares; and 4. The farming activities do not form part of an enterprise being undertaken on more than one property; or Where the property area is greater than 4.1 hectares; 5. For grazed land, the stocking rate of the land is less than 6 stock units per hectare; and 3. No arable cropping occurs; and 4. The farming activities do not form part of an enterprise being undertaken on more than one property. 5. Where the land is used for grazing</p>		<p>requirements in Schedule C require significant amendment and refers to its submission on Variation 1.</p> <p>FFNZ does not support the input approach and input standards proposed by this submitter for reasons including that a "one size fits all" approach is not appropriate, will impose significant cost for no net benefit and a tailored and proportionate approach is required (FFNZ refers to its submission on Variation 1, in particular its proposal for FEPs and MPA).</p>

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			<p><u>livestock, the stocking rate of the land is no greater than the levels specified in Rule 3.11.5.4 {Appendix D} [Rule 4 in the submission].</u></p> <p><u>6. No part of the property or enterprise over 15 degrees slope is cultivated or grazed;</u></p> <p><u>7. No winter forage crops are grazed in situ;</u></p> <p><u>8. Where the property or enterprise contains any of the water bodies listed in Schedule C:</u></p> <p><u>i. There shall be no cultivation within 5 metres of the bed of the water body; and</u></p> <p><u>ii. New fences installed after 22 October 2016 must be located to ensure livestock (not including sheep) cannot be within 3 metres of the bed of the water body (excluding constructed wetlands and drains);</u></p> <p><u>9. From 31 March 2018, for all properties greater than 2 ha, the following information must be provided to the Waikato Regional Council by 1 September each year:</u></p> <p><u>a. Annual stock numbers; and</u></p> <p><u>b. Annual fertiliser use; and</u></p> <p><u>c. Annual brought in animal feed; and</u></p> <p><u>d. The requirements in Schedule A."</u></p>		
Raukawa Charitable Trust Submitter ID: 74073	PC1-10571	Rule 3.11.5.1	RETAIN Rule 3.11.5.1.	Oppose in part	FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.
Ravensdown	PC1-10139	Rule 3.11.5.1	RETAIN the intent of Rule 3.11.5.1 as	Oppose in	FFNZ considers that amendments are needed

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Limited Submitter ID: 74058			it is currently written.	part	including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.
South Waikato District Council Submitter ID: 72892	PC1-4177	Rule 3.11.5.1	<p>AMEND Rule 3.11.5.1(4) to read: "4. The farming activities do not form part of an enterprise being undertaken on more than one property <u>within the Waikato River and or Waipā River catchments.</u>"</p> <p>AND AMEND 3.11.5.1(5) to clarify the meaning of: 'grazed land' to mean land that is fenced and in pasture throughout most/all of the year</p> <p>AND provide evidence that the section 32 rationale confirms 6 stock units per hectare is the preferred approach to adopt to achieve the objectives of the Vision and Strategy</p> <p>AND review 3.11.5.1(6) as to the reasons for the adoption of this performance standard</p> <p>AND provide evidence that the approach taken in 3.11.5.1(6) meets the section 32 efficiency and effectiveness tests, otherwise</p> <p>REMOVE the standard</p> <p>AND AMEND 3.11.5.1(7) to read: "7. The farming activities do not form part of an enterprise being undertaken on more than one property <u>within the Waikato River and or Waipā River catchments.</u>"</p> <p>AND CONSIDER alternative approaches that incorporate the use of performance standards for the</p>	Support in part	FFNZ agrees that Rule 1 could be amended to clarify the area it applies to. However, FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			range of primary production activities that are able to establish as 'small and low intensity farming activities' (currently defined under Rules 3.11.5.1 and 3.11.5.2) throughout the region.		
Stark, Steven and Theresa Submitter ID: 73721	PC1-5167	Rule 3.11.5.1	AMEND Rule 3.11.5.1 to read: "3.11.5.1 Permitted Activity Rule- Small and <u>or</u> Low Intensity farming activities. 3.11.5.1 5) For grazed land, the stocking rate of the land is less than 6 18 units per hectare; and"	Support in part	FFNZ agrees that Rule 1 ought to apply to small or low intensity farming. In principle, it considers that Rule 1 could apply to activities less than 18 stock units but considers that a more robust approach might be to limit this to 9 stock units and amend Rule 2 that applies to more intensive farming activities as set out in FFNZ's submission on Variation 1.
Stokman, Mark and Sharon Submitter ID: 73976	PC1-6688	Rule 3.11.5.1	AMEND Rule 3.11.5.1 to be consistent with Policy 4 and enable small and low intensity and low risk farming activities to continue if existing, be established and be flexible AND AMEND to merge Rule 3.11.5.1 and 3.11.5.2 into one rule AND AMEND to include as a Permitted Activity land uses with stocking rates at or below 18 stock units and enable the stocking rate to increase from current up to this standard OR AMEND to relate stocking rates to soil and geology, ie 20 stock units for Land Use Capability classes 1, 2 and 3; 18 stock units for Land Use Capability class 4; and 16 stock units for Land Use Capability class 6 or 7 OR AMEND to set nitrogen loading	Support in part Oppose in part	FFNZ agrees that rules 1 and 2 ought to be provide reasonable flexibility for low intensity farming activities to continue and to increase nitrogen. FFNZ proposes in its submission on Variation 1 that this ought to be on the basis of 15kgN for Rule 2 or some other reasonable "permitted baseline." In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues. FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>limits such as 25kg/N/ha/yr for Land Use Capability class 1; 20kg/N/ha/yr for Land Use Capability class 2; 18kg/N/ha/yr for Land Use Capability class 3; 16kg/N/ha/yr for Land Use Capability class 4; 12kg/N/ha/yr for Land Use Capability class 5; 10kg/N/ha/yr for Land Use Capability class 6; and 8kg/N/ha/yr for Land Use Capability class 7 (or viable alternatives) AND DELETE the 6 stock unit standard AND DELETE the 4.1 hectares limit and provide for up to 20 hectares AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards AND DELETE any standards or clauses which hold land uses to historic discharges levels or stocking rates AND AMEND PPC1 to apply national stock exclusion requirements which relate to exclusion of cattle, deer and pigs from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier or other technologies) on flat land and rolling land but not on hill country AND AMEND riparian setback distances so they only apply to flat and rolling land and not hill country (ie slope <= 15 degrees)</p>		<p>leaching.</p> <p>FFNZ opposes relating the stocking rate to soil and geology on the basis of LUC as proposed. This is for reasons including that it is effectively allocation, FFNZ does not support allocation, FFNZ considers LUC is not a proxy for nitrogen and FFNZ is concerned about the robustness of the stocking rate measures that underpin LUC or about the robustness of the use of LUC for anything other than one of the available on farm decision support tools.</p> <p>FFNZ supports the NRP as long as it is used as a reference point and not to grandparent nitrogen. FFNZ considers that flexibility ought to be provided for low intensity farming activities to increase nitrogen as a permitted activity (in its submission on Variation 1, FFNZ proposes that this threshold is set at 15kgN or an alternative reasonable “permitted baseline”).</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ’s submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND DELETE the requirements in Rule 3.11.5.1 relating to excluding cattle from waterbodies through permanent fencing AND AMEND Rule 3.11.5.1, where there is a scientifically proven water quality issue related to stock access to waterbodies, so the requirement to exclude cattle through permanent fencing is tailored on a farm by farm, district by district and sub-catchment basis, ensuring flexibility to provide for alternative management arrangements for certain land uses and terrains to achieve the same outcome AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week.</p>		
Tamahere Community Committee Submitter ID: 73090	PC1-7614	Rule 3.11.5.1	AMEND Rule 3.11.5.1 to increase the property land area from 2 hectares to 6 hectares.	Support in part	FFNZ considers that the information requirements in Schedule A ought to be amended to 4.1ha to reflect the approach taken in the rule framework.
Taupo District Council Submitter ID:	PC1-8161	Rule 3.11.5.1	AMEND to clarify the area of land that the stocking rate is applied over. The preferred approach is to apply	Support in part	In principle, FFNZ agrees that a total property approach ought to be adopted but considers that flexibility ought to be retained e.g. where a low

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74207			the stocking rate over the total property area AND AMEND to clarify whether parts of a property that cannot be used for farming activities are excluded from the total property area AND AMEND to include the 2 hectare provision from Schedule A in Rule 3.11.5.1.		intensity property is owned as well as a higher intensity property, the stocking rate ought to only apply to the low intensity property. FFNZ considers that parts that cannot be used for farming activities should not be excluded from the total property area. FFNZ considers that the 2ha provision in Schedule A ought to be amended to 4.1ha to be consistent with the rest of the rule framework and because that is an appropriate basis to gather information.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11808	Rule 3.11.5.1	RETAIN Rule 3.11.5.1.	Oppose in part	FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.
Te Miro Farms Partnership Submitter ID: 72893	PC1-6925	Rule 3.11.5.1	AMEND PPC1 to change the definition of a waterway to that of the National Water Accord. AND AMEND PPC1 to change the slope requirements to 15 degrees in accordance with the National Water Accord. AND AMEND to extend the stock exclusion timelines and give certainty to those with land classed as 6+ that it will not be converted to forestry in future plan changes. AND AMEND PPC1 to allow the individual Farm Environment Plan to identify mitigation approaches against contaminants, relevant to each farm, rather than a blanket approach. AND AMEND PPC1 to base	Support in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation. FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1. FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>the necessity of fencing of waterbodies on their current level of contamination, stocking rate and the proven impact of fencing. AND AMEND PPC1 to enable stock to enter waterbodies if they are being actively managed and the waterbody is not crossed by stock more than 3 times per week. AND AMEND to include provisions that any waterway fencing be subsidised by the Waikato Regional Council. AND AMEND PPC1 so that Farm Environment Plans allow for mitigation against contaminants and do not include prescriptive blanket measures. AND AMEND PPC1 so properties are not required to be held at or below their Nitrogen Reference Point. AND AMEND PPC1 so that the timeframes are extend to enable compliance with the Farm Environment Plan provisions. PUT ON HOLD the implementation of PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment.</p>		nitrogen.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	PC1-8423	Rule 3.11.5.1	<p>AMEND Rule 3.11.5.1 to only apply to properties under 4.1 hectares OR AMEND Rule 3.11.5.1(5) to read as follows: "For grazed land, the The stocking rate</p>	Oppose	FFNZ considers these restrictions are too inflexible, do not reflect the nature of farming and will likely impose significant cost for no net benefit.

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Submitter ID: 74122			of <u>any land being grazed, at any time, on the land</u> is less than 6 stock units per hectare <u>on the land being grazed at that time; and"</u>		
Timberlands Limited Submitter ID: 73036	PC1-3430	Rule 3.11.5.1	RETAIN Rule 3.11.5.1.	Oppose in part	FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.
Treweek, Glen Submitter ID: 72747	PC1-5783	Rule 3.11.5.1	AMEND Rule 3.11.5.1 to read: "...The use of land for farming activities (excluding commercial vegetable production) and the associated ... conditions: 1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and Either: 3-1. The property area is less than or equal to 4-110 hectares for commercial vegetable production, or less than or equal to 40 hectares for all other farming operations.; and 4. The farming activities do not form part of an enterprise being undertaken on more than one property; or Where the property area is greater than 4.1 hectares; 5. For grazed land, the stocking rate of the land is less than 6 stock units per hectare; and 6. No arable cropping occurs; and 7. The farming activities do not form	Support in part	FFNZ agrees that provision needs to be made for commercial vegetable growing. However, FFNZ considers that it might be more appropriate to provide for these activities through Rules 5 and 5A as proposed in FFNZ's submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>part of an enterprise being undertaken on more than one property. 5.2. For all properties greater than 4-420 hectares, but less than 40 hectares, (excluding commercial vegetable production), from 31 March 2019, in addition to the requirements of Schedule A, the following information must be provided to the Waikato Regional Council by 1 September each year recorded: a. Annual ..."</p>		
Tucker, Geoff and Kara Submitter ID: 73928	PC1-2744	Rule 3.11.5.1	<p>AMEND Rule 3.11.5.1 so that land uses with a stocking rate at or below 18 stock units per hectare (as at 30 June in any given year) be allowed as a permitted activity. Enable stocking rate to increase or decrease whilst remaining below 18 units/ hectare as proven by a farm Environment Plan at farmers discretion, age, stage of life, etc. AND DELETE any standards or clauses from PPC1 which hold to historic discharge levels or stocking rates AND AMEND PPC1 riparian setback distances and fencing requirements to apply only to land less than 15 degrees in slope AND AMEND PPC1 to align it with the National Policy statement on Freshwater including the waterway definition, slope of land requiring</p>	Support in part	<p>FFNZ agrees that Rule 1 or Rule 2 needs to reasonably provide for low intensity farming activities as a permitted activity. However, FFNZ considers that 18 stock units might be too high a threshold and that this activity might be better addressed through the amendments FFNZ proposes to Rule 2 as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>fencing and stocking rate parameters set out in there AND AMEND to allow individual Farm Environment Plans to offer mitigations appropriate to individual farms and sub-catchments AND subsidise waterway fencing AND AMEND to give hill country farmers time to show their current water quality AND AMEND so that where fencing is required, surety is provided that those properties will not be forced into plantation forestry by future plan changes AND AMEND PPC1 so farm Environment Plans can be produced by the farmer or landowner, with Waikato Regional Council guidance and support AND AMEND Farm Environment Plan requirements to adopt nationally recommended standards around fencing and the upper limit of low intensity agriculture (18 stock units per hectare as at 30 June in any given year) AND AMEND to enable flexibility in nitrogen emissions from low intensity sheep and beef farming AND MAKE any consequential amendments.</p>		<p>something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p>
Waikato and Waipa Branches of the New Zealand Deer	PC1-9579	Rule 3.11.5.1	AMEND Rule 3.11.5.1(2) to read: "Cattle, horses, deer and pigs are excluded from water bodies in	Support in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum

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Farmers Association Submitter ID: 74008			conformance with Schedule C according to a schedule of work as identified in a Farm Environment Plan; and..."		standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3521	Rule 3.11.5.1	RETAIN Rule 3.11.5.1.	Oppose in part	FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.
Waikato Regional Council Submitter ID: 72890	PC1-3115	Rule 3.11.5.1	AMEND Rule 3.11.5.1 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1 AND AMEND 3.11.5.1 (4) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property (unless the enterprise has a total area of less than or equal to 4.1 hectares); or" AND AMEND 3.11.5.1 (7) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property (unless the enterprise has a total area of less than or equal to 20 hectares)" AND AMEND 3.11.5.1(2) to read: "The use of land for farming activities scattle, horses, deer and pigs are excluded from water bodies in	Support in part Oppose in part	FFNZ supports clarifying the scope of Rule 1. It agrees with the clarification of the combined enterprise of 4.1ha but notes that FFNZ also consider the stock exclusion and setback requirements also need clarification and refers to its submission on Variation 1. FFNZ considers that the information requirements ought to apply to properties over 4.1ha, with consequential amendment to Schedule !.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			conformance with <u>complies</u> with Schedule C; and" AND AMEND 3.11.5.1(1) to read: "The property (if greater than <u>2 hectares</u>) is registered with the Waikato Regional Council in conformance with <u>shall comply</u> with Schedule A; and"		
Waipa District Council Submitter ID: 67704	PC1-3167	Rule 3.11.5.1	AMEND Rule 3.11.5.1 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules.	Support	FFNZ agrees that subdivision, leasing and changes to farm enterprises needs to be provided for and that the approach ought to be reasonable and least cost. FFNZ proposes in its submission on Variation 1 that this is addressed through a condition in the controlled activity and other rules to require a new NRP to be calculated if property is subdivided.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11370	Rule 3.11.5.1	RETAIN Rule 3.11.5.1 as notified or amended by similar wording to like effect.	Oppose in part	FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2138	Rule 3.11.5.1	RETAIN Rule 3.11.5.1 as proposed.	Oppose in part	FFNZ considers that amendments are needed including to clarify stock exclusion and property area as proposed in FFNZ's submission on Variation 1.
Waitomo District Council Submitter ID: 73688	PC1-10326	Rule 3.11.5.1	AMEND Rule 3.11.5.1 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance.	Support	FFNZ agrees that subdivision, leasing and changes to farm enterprises needs to be provided for and that the approach ought to be reasonable and least cost. FFNZ proposes in its submission on Variation 1 that this is addressed through a condition in the controlled activity and other rules to require a new NRP to be calculated if property is subdivided.
Advisory Committee on Regional	PC1-9571	Rule 3.11.5.2	CONSIDER supporting programmes that support the retirement of vulnerable areas. Rule 3.11.5.2.	Support in part	FFNZ would support in principle non regulatory programmes (including funding) for retirement of steep and erosion prone land. However, FFNZ

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Environment (ACRE) Submitter ID: 72441				Oppose in part	considers that this is not suitable as a regulatory approach or requirement.
Alcock, Carl and Jo Submitter ID: 73376	PC1-2100	Rule 3.11.5.2	<p>AMEND Rule 3.11.5.2 Low Intensity Land Uses to ensure consistency with Policy 4, and provide for small and low intensity activities to be enabled. This includes the ability to continue to exist, be established and flexible.</p> <p>AND MAKE any other consequential amendments arising from this submission point.</p> <p>Nitrogen Reference Point AMEND by removing the Nitrogen Reference Point and use of OVERSEER.</p> <p>AMEND by adopting a sub-catchment approach to addressing contaminants relevant to each sub-catchment.</p> <p>AMEND by removing a blanket restriction of one nutrient that may not even be relevant for that sub-catchment.</p> <p>AMEND by using Farm Environment Plans to determine what is best for each farm and science to determine what contaminants are an issue in each sub-catchment.</p> <p>DELETE the Nitrogen Reference Point and Overseer from all other areas in PPC1.</p> <p>AND MAKE any other consequential amendments.</p>	Support in part	<p>FFNZ agrees that small and low intensity activities need to be enabled and flexibility provided for increases in nitrogen.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ also supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. FFNZ supports an approach based on considering sub-catchment characteristics and tailored and proportionate actions in FEPs.</p> <p>FFNZ supports tailored FEPs based on critical source areas and identification of appropriate mitigations through the MPA framework proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Stock Exclusion AMEND by using the national waterway accord recommendation that slope up to 15 degrees be fenced. AMEND by changing the exclusion requirements on a less than 15 degree slope so that they only apply to all permanently flowing waterbodies 1 metre or greater. AMEND by providing certainty that fencing is going to be enough and future retirement of land will not be required. AMEND by allowing stock to be mustered through waterbodies up to 3 times per week without a formed stock crossing structure. AND MAKE any other consequential amendments arising from this submission point. Farm Environment Plans AMEND by requiring Farm Environment Plans only in sub-catchments where science indicates improvements are required. AMEND by allowing flexibility in Farm Environment Plans so that they can be tailored to the individual property and focus on critical source management rather than blanket regulatory standards. AMEND to establish an independent panel to allow contested points between staff and farmers to be</p>		<p>setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			settled without the expensive need to appeal to the Environment Court. AND MAKE any other consequential amendments arising from this submission point.		
Allan, Eric Submitter ID: 73438	PC1-6068	Rule 3.11.5.2	AMEND Rule 3.11.5.2 to enable stocking rates of up to 18 stock units. AND AMEND to provide a practical response to the issues raised. AND DELETE the requirement to exclude cattle and deer through permanent fencing from all permanently flowing water bodies on hill country greater than 15 degrees slope. AND DELETE the requirement to have formed crossing structures and only require simple crossings. AND DELETE requirement to be held at or below a property's Nitrogen Reference Point for drystock farming.	Support in part	FFNZ agrees that flexibility ought to be provided to provide for nitrogen increases as a permitted activity up to a reasonable permitted baseline. FFNZ is concerned that 18 stock units may be too high and refers to its amendments to Rule 2 in its submission on Variation 1. FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation. FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen.
Aston, Lucy Submitter ID: 73020	PC1-7064	Rule 3.11.5.2	AMEND to merge Rule 3.11.5.1 and 3.11.5.2 into one rule AND AMEND Rule 3.11.5.2 to include as a Permitted Activity land uses with stocking rates at or below 18 stock units and enable the stocking rate to increase from current up this standard, AND/OR relate to	Support in part Oppose in part	FFNZ agrees that rules 1 and 2 ought to be provide reasonable flexibility for low intensity farming activities to continue and to increase nitrogen. FFNZ proposes in its submission on Variation 1 that this ought to be on the basis of 15kgN for Rule 2 or some other reasonable "permitted baseline." FFNZ is concerned that 18 stock units may be too high but would support if it was an appropriate measure of

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>the natural capital of soils for sustainable production/farming AND DELETE standards which hold farmers to historic stocking rates of nitrogen discharges. AND AMEND PPC1 so that if nitrogen is to be allocated then this is done using land use capability as adopted in the Horizons and Hawkes Bay Regions. AND DELETE the 6 stock unit standard from Rule 3.11.5.2 AND DELETE the 4.1 hectares provision from Rule 3.11.5.2 and provide for up to 20 hectares AND AMEND the riparian setback distances so they only apply to flat and rolling land and not hill country (ie slope > 15 degrees) AND DELETE point 4(c) from Rule 3.11.5.2. AND DELETE the Nitrogen Reference Point requirements from PPC1. AND, if the Nitrogen Reference Point requirements are not deleted, AMEND PPC1 so that the OVERSEER Model is not solely relied on but is used as part of a range of measurement tools AND AMEND PPC1 so that where Overseer is used that the Best Management Practices are applied including input standards and protocols, applying actual farm</p>		<p>the permitted baseline.</p> <p>In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching.</p> <p>FFNZ supports the NRP as long as it is used as a reference point and not to grandparent nitrogen. FFNZ considers that flexibility ought to be provided for low intensity farming activities to increase nitrogen as a permitted activity (in its submission on Variation 1, FFNZ proposes that this threshold is set at 15kgN or an alternative reasonable “permitted baseline”).</p> <p>FFNZ considers that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>specific information and reducing use of standardised input parameters AND REMOVE the requirement for operations at or under 18 stock units, and sheep and beef farmers to have to manage to a Nitrogen Reference Point AND AMEND PPC1 to adopt a sub-catchment approach to addressing contaminants that are relevant to each farm and waterbody AND AMEND PPC1 so that where nitrogen discharges from a property have to be allocated then the allocation system is based on the natural capital of soils and the water quality outcomes that are to be achieved for each sub-catchment, not on the 2014/15 or 2015/16 land use or grandparenting approach AND AMEND PPC1 so that Farm Environment Plans are used to determine what would work best on each farm AND AMEND the slope requirements to be no greater than 15 degrees in accordance with the Clean Water Report AND AMEND the stock exclusion timelines by lengthening them and give certainty to those with land classified at risk of erosion that it will not be converted to forestry in a future plan change AND AMEND PPC1 to enable</p>		<p>standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP.</p> <p>FFNZ supports the availability of funding and</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>individual Farm Environment Plans to present farm specific mitigations against contaminants AND AMEND PPC1 to enable stock to enter waterbodies if they are being actively managed and the waterbody is not crossed by stock more than 3 times per week AND ADD new provisions that state that any waterway fencing be subsidised by the Waikato Regional Council and the regional communities, urban and rural, benefiting from improvements to the waterways. AND AMEND the Farm Environment Plan requirements so they are only required in sub-catchments where science indicates improvements are required AND AMEND PPC1 so that for Farm Environment Plans an independent panel is available to ensure accountability and enable contested points to be settled without appeals to the Environment Court AND AMEND the stock exclusion provisions of PPC1 to the standards recommended in the Clean Water Report (February 2017) AND AMEND the stock exclusion provisions of PPC1 so fencing is required above 15 degree slope for farming operations greater than 18su/ha</p>		<p>consideration of the resource reasonably available to the farm enterprise and agrees that timeframes ought to be extended particularly in light of the two year delay following notification of PC1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND PPC1 so mitigations are set on a farm by farm basis, focused on management of clearly identified and measurable 'critical source management areas'</p> <p>AND AMEND PPC1 so the rules are focused on reducing impacts from intensive agriculture greater than 18su/ha rather than applying blanket rules to all extensive agriculture</p> <p>AND AMEND the Farm Environment Plan requirements so they are produced by the landowner with Waikato Regional Council guidance and support</p> <p>AND AMEND PPC1 so that there is flexibility in nitrogen leaching from hill country sheep and beef farming, and land uses which are low impact (at or below 20kgN/ha/yr for example or apply natural capital allocation)</p> <p>AND AMEND the timeframes to prepare Farm Environment Plans so they are set through consultation with the farmer taking into account the Waikato Regional Council subsidy available; the individual farmer's financial constraints; and the sensitivity of the waterbody to any impact.</p>		
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6192	Rule 3.11.5.2	<p>AMEND Rule 3.11.5.2(4) as follows:</p> <p>"c. No part of the property or enterprise over 45 23 degrees slope is cultivated or grazed; and</p> <p>d. No winter forage crops are grazed</p>	Oppose	FFNZ considers that reasonable, practical and affordable minimum standards ought to be set in Schedule C and the need for more stringent standards ought to be considered through tailored and proportionately FEPs that consider critical

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			in situ, <u>within 10 metres of any waterway</u> ; and..."		source areas and apply FFNZ's MPA framework to identify mitigations (FFNZ refers to its submission on Variation 1).
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-10997	Rule 3.11.5.2	DELETE Rule 3.11.5.2(4)(b)(i) AND AMEND Rule 3.11.5.2.(4)(b)(ii) to read: "15kg nitrogen/hectare/year, whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B ; and" AND DELETE Rule 3.11.5.2(4)(c) AND AMEND Rule 3.11.5.2.(4)(e)(i) to read: "There shall be no cultivation within 5 metres of the bed of the waterbody <u>and/or the defined buffer sizes in Schedule D, whichever is the greater</u> ; and"	Oppose	FFNZ considers that more flexibility (not less) is needed in Rule 2 to provide for low intensity farm enterprises to increase nitrogen. FFNZ also considers that the minimum standards in Schedule C ought to be reasonable, practical and affordable with more stringent setbacks or fencing considered as part of tailored FEPs. FFNZ is concerned that PC1 imposes significant cost and is concerned that this submitter's proposal will result in even more cost for no net benefit.
Bailey, James Submitter ID: 73926	PC1-9043	Rule 3.11.5.2	DELETE the Rule 3.11.5.2 requirement to manage property level discharges to a Nitrogen Reference Point based on historic profiles AND AMEND PPC1 to apply Land Use Suitability and Natural Capital now by including allocation based on the Natural Capital of soils through a Land Use Capability approach AND AMEND to provide a flexibility cap for low leaching farm systems below a certain threshold (20kg/N/ha/yr) that is deemed as a sustainable level for the transition period, with farmers with a Nitrogen	Oppose in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance. FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Reference Point below this enabled to increase up to this point AND REMOVE the 15 degree slope threshold and the restriction on winter forage crops, provided there is a Farm Environment Plan or the farm is operating below the threshold nitrogen limit.		decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit. FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6901	Rule 3.11.5.2	AMEND Rule 3.11.5.2(4)(c) to read: "No part of the property or enterprise over 15 degrees slope is cultivated or grazed, <u>except where the property is managed in accordance with Good Management Practices that accord with the practices described in the document entitled 'Industry-agreed Good Management Practices relating to water quality' - dated September 2015; and...</u> " AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	Support in part	FFNZ considers that cultivation above 15 degrees ought to be considered through an FEP as opposed to a blanket exclusion of this activity (FFNZ refers to its submission on Variation 1). While FFNZ prefers its approach, this submitter's proposal provides some flexibility for cropping above 15 degrees and FFNZ would support in it in the alternative that its proposal (or something more favourable) is not successful.
Balle Bros Group Submitter ID: 67834	PC1-11423	Rule 3.11.5.2	AMEND Rule 3.11.5.2(4) to read: 'Where the property or enterprise area is greater than 20 hectares: "a. A Nitrogen Reference Point is	Support in part Oppose in	FFNZ supports properties obtaining an NRP provided it is only used as a reference point and not to grandparent nitrogen and provided flexibility is provided for using Overseer as set out in FFNZ's

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>produced for the property or enterprise in conformance with Schedule B; and</p> <p>b. The diffuse discharge of nitrogen from the property or enterprise does not exceed either:</p> <p>i. the Nitrogen Reference Point; or ii. 15kg nitrogen/hectare/year; whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B;" and</p> <p>c. No part of the property or enterprise over 15 degrees slope is cultivated or grazed "<u>unless effects of diffuse discharges are mitigated</u>"; and...!</p>	part	<p>submission on Variation 1.</p> <p>FFNZ considers that a "permitted baseline" ought to be provided, either 15kgN (with farming activities able to increase up to it) or some other reasonable measure).</p> <p>FFNZ agrees that cultivation and grazing of slopes above 15 degrees needs to be provided for and FFNZ considers this can be managed through a simplified FEP (see FFNZ's submission on Variation 1).</p>
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11502	Rule 3.11.5.2	<p>AMEND Rule 3.11.5.2 to give effect to PPC1 amended Objectives and Policies including Policy 1, Policy 2, and Policy 4 AND enable activities with lower contaminant discharges including nutrient discharges to continue OR to be established. AND AMEND Rule 3.11.5.2 as follows:</p> <p>"The use of land for farming activities (excluding commercial vegetable production) and the associated diffuse discharge of Nitrogen, Phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water where the property areas is greater</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that low intensity activities ought to be enabled. FFNZ agrees that commercial vegetable production needs to be provided for.</p> <p>FFNZ considers that a "permitted baseline" ought to be provided, either 15kgN (with farming activities able to increase up to it) or some other reasonable measure). FFNZ would support that baseline being 20kgN if it was supported by the science.</p> <p>FFNZ supports properties obtaining an NRP provided it is only used as a reference point and not to grandparent nitrogen and provided flexibility is provided for using Overseer as set out in FFNZ's submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>than 4.1 hectares, and has more than 6 stock units per hectare or is used for arable cropping, is a permitted activity subject to the following conditions..."</p> <p>AND DELETE Rule 3.11.5.2 (3) (a) to (e).</p> <p>AND DELETE Rule 3.11.5.2 (4) (b) (i).</p> <p>AND AMEND Rule 3.11.5.2 (4) (ii) as follows:</p> <p>"15kgN/ha/year 20kgN/ha/year" OR alternatively replace 20kgN/ha/year with the 'sustainable level' calculated in accordance with Policy 1 and Policy 2, OR adopt a permitted threshold for Nitrogen discharge based on land use capability as a proxy for land use suitability.</p> <p>AND DELETE "grazed" from Rule 3.11.5.2 (4) (c).</p> <p>AND AMEND Rule 3.11.5.2 (4) (d) to provide for some winter grazing of crops below a minimum area or with criteria contained within the Rule to reduce risk of loss from critical source areas.</p> <p>AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards and or thresholds.</p> <p>AND DELETE any standards or clauses which hold land uses to historic nutrient discharge levels or stocking rates.</p>		

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Cameron, Bruce Submitter ID: 60603	PC1-6387	Rule 3.11.5.2	<p>RETAIN Rule 3.11.5.2 AND AMEND Rule 3.11.5.2 so that cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</p> <p>AND AMEND Rule 3.11.5.2 to remove the Nitrogen Reference Point AND AMEND PPC1 to address contaminants on a sub-catchment bases targeting the highest emitting sub-catchments</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan</p> <p>AND AMEND Rule 3.11.5.2 to read: "The use of land for farming activities (excluding commercial vegetable production) and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water where the property area is greater than 4.1 hectares, and has more than 6 stock units per hectare <u>but less than 18 stock units per hectare at 30 June 2016</u> or is used for arable cropping, is a permitted activity</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports properties obtaining an NRP provided it is only used as a reference point and not to grandparent nitrogen and provided flexibility is provided for using Overseer as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that a "permitted baseline" ought to be provided, either 15kgN (with farming activities able to increase up to it) or some other reasonable measure). FFNZ would support that baseline being 18 stock units if it was supported by the science.</p> <p>FFNZ agrees that cultivation and grazing of slopes above 15 degrees needs to be provided for and FFNZ considers this can be managed through a simplified FEP (see FFNZ's submission on Variation 1).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			subject to the following conditions" AND DELETE Rule 3.11.5.2-3b(i) AND AMEND 3.11.5.2.4c to read: "No part of the property or enterprise over 45 25 degrees slope is cultivated or grazed <u>unless effect of diffuse discharges can be mitigated</u> ". AND AMEND to include clarification around stock exclusion requirements, ie setback buffers and where to measure setback from on undulating land.		
Charion Investment Trust Submitter ID: 71344	PC1-7790	Rule 3.11.5.2	Rule 3.11.5.2: DELETE all the rules and schedules as appropriate to remove provisions for land use consent terms and conditions. AND RETAIN the use of rules for the control and reduction of nitrogen, phosphorous, sediment and microbial pathogens.	Oppose in part	FFNZ considers that a reasonable consenting framework needs to be provided and considers this can be achieved through the consenting framework proposed in FFNZ's submission on Variation 1. FFNZ considers that the rules need to be hybrid land use and discharge rules due to the nature of diffuse discharges e.g. they cannot be directly measured.
Christian and Anderson, Ashley John and Frances Ann Submitter ID: 73064	PC1-4758	Rule 3.11.5.2	Rule 3.11.5.2: REMOVE the use of the OVERSEER Model to derive the Nitrogen Reference Point AND AMEND to invest in a purpose built model to deliver information on properties and management practices and to enable a base/reference point to be established AND AMEND so nitrogen usage is allocated on an individual property capacity (as denoted in the Farm Environment Plan which would take into account soil type, climatic	Support in part Oppose in part	FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults. FFNZ also supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>conditions, etc) AND AMEND so the sub-catchment approach focuses on contaminants that are pertinent to individual farms (as denoted in the Farm Environment Plan) AND AMEND so nutrient management methods are not based on grandparenting. Use science to regulate appropriate usage AND AMEND stock exclusion provisions to allow for stock to cross waterways if they are being actively controlled. Individual Farm Environment Plans to state how many time crossings are allowed AND AMEND so individual Farm Environment Plans outline mitigations against contaminants specific to each farm, in-line with the Ministry for the Environment Draft Regulatory Impact Statement: stock exclusion AND AMEND the definition of a waterway to that of the National Water Accord. AND AMEND to include a subsidy for waterway fencing AND AMEND PPC1 to allow grazing on different contours, taking into account soil type, distance from waterbodies, climatic conditions, vegetative cover, type of stock, etc, to determine a stocking rate. This would be contained in the property's Farm Environment Plan which would break</p>		<p>out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			down the property into areas as per above and alter the stocking rate on each area AND AMEND 3.11.5.2 (3) to increase the size of the property to align with an economic model incorporating property size.		
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10798	Rule 3.11.5.2	AMEND Rule 3.11.5.2 to read: "Rule 3.11.5.1 - Permitted Activity Rule – Small and Low Intensity farming activities The use of land for farming activities (excluding commercial vegetable production) and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a permitted activity subject to the following conditions: 1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and <u>The Property complies with the region-wide Good Management Practices for pastoral land use; and"</u>	Support in part Oppose in part	In principle, FFNZ agrees that farming activities ought to comply with industry agreed GMP. However, FFNZ is concerned that requiring this as a permitted activity standard may result in a "one size fits all" approach. It considers that a better approach is to require these activities to obtain a simplified FEP as set out in FFNZ's submission on Variation 1.
Cotman, Jim Submitter ID: 59884	PC1-4584	Rule 3.11.5.2	WITHDRAW PPC1 AND REPLACE with a new plan that endorses 'Best Practical Options' that are developed by landowners AND AMEND to provide a new plan	Support in part	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>that supports the development and implementation of Catchment Management Plans that are led by landowners AND ENSURE this new plan supports identifying potential critical source contaminant pathways on a sub-catchment basis to provide quantifiable measures and factual information into Catchment Management Plans AND ENSURE the new plan encourages innovative new science that can provide alternative means to managing water quality AND ENSURE the new plan recognises that well informed landowners as stewards of their land are the best and only people who can create action on the ground AND ENSURE the new plan favours a 'shared values' approach where all parties work toward achieving sensible water quality targets [set aside regulatory elements]. AND ENSURE that the primary focus of the new plan is a comprehensive programme to eliminate Koi Carp along with the native species predator, catfish.</p>		<p>controls, as some submitters have proposed.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate. FFNZ agrees that robust science and information is required over the lifetime of this plan.</p> <p>FFNZ agrees that landowners ought to be involved in the preparation of FEPs and in the development of mitigations.</p> <p>FFNZ considers that a rules framework is needed but that this ought to provide a reasonable consenting or permitted activity pathway as proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that koi carp need to be addressed and that the focus ought to be on all sources of contaminants, not just diffuse discharges from farming activities.</p>
Craig, Jeffery Submitter ID: 73072	PC1-9674	Rule 3.11.5.2	<p>WITHDRAW PPC1 and rewrite in consultation with landowners to ensure it is achievable, affordable and practical AND AMEND to include a plan for</p>	Support in part	<p>FFNZ supports the availability of funding and consideration of the resource reasonably available to the farm enterprise, considers that removal of carp ought to be undertaken and that practical things like drain cleaning ought to be provided for.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>how the Vision is to be funded and physically achieved, including consideration of compensation for land use change AND AMEND Rule 3.11.5.2 to determine stock exclusion fencing requirements on an individual farm basis, taking other mitigation measures into account AND AMEND to exclude small waterways from fencing requirements, with a minimum width and depth for fencing AND AMEND to extend the timeframe for fencing AND AMEND to clarify how slope is measured AND AMEND to clarify how land within setbacks is to be maintained and funded, with consideration of Council-subsidised planting and spraying programmes AND AMEND to determine stock crossing requirements on an individual farm basis, with no culvert crossing required when stock crossing is infrequent AND AMEND to plan for the removal of carp AND AMEND to ensure drains are still able to be cleaned AND AMEND to provide for Council to fund fencing and associated costs AND AMEND to allow owners to prepare Farm Environment Plans</p>		<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations identified using FFNZ's MPA framework (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND to extend the timeframe for Farm Environment Plans</p> <p>AND AMEND to provide for separate, reliable measures for the discharge of sediment, nitrogen, phosphorous and microbial pathogens</p> <p>AND AMEND to provide for a Council subsidy for Farm Environment Plan costs</p> <p>AND AMEND to clarify penalties and enforcement for not preparing or implementing a Farm Environment Plan</p> <p>AND AMEND to allow Farm Environment Plans for each land use block rather than the whole property where there is mixed use</p> <p>AND AMEND to provide alternatives to the OVERSEER Model</p> <p>AND REMOVE use of the Nitrogen Reference Point and consider individual farm issues</p> <p>AND AMEND to extend the timeframe to enable alternative programmes to Overseer to be developed</p> <p>AND AMEND to ensure an even playing field for contaminant discharges irrespective of past levels</p> <p>AND AMEND to provide clarity on how discharge levels and reductions will work in practical terms.</p>		<p>provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p>
Farmers 4 Positive Change (F4PC)	PC1-10425	Rule 3.11.5.2	AMEND to consolidate Rules 3.11.5.1 and 3.11.5.2 into one rule	Support in part	FFNZ agrees that rules 1 and 2 ought to be provide reasonable flexibility for low intensity farming

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73355			<p>AND AMEND to allow as Permitted Activity land uses with stocking rates at or below 18 stock units and enable stocking rates to increase from current up to this rate, subject to land suitability</p> <p>AND AMEND to relate stocking rate to soil and geology, with 20 stock units on Land Use Capability class I, II or III; 18 stock units on class IV or V; 10 stock units on class VI or VII</p> <p>AND DELETE the 6 stock unit standard</p> <p>AND REPLACE the 4.1 hectare limit and provide for up to 20 hectares</p> <p>AND AMEND to align with national stock exclusion requirements which relate to exclusion of cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat land and rolling land, but not on hill country</p> <p>AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards</p> <p>AND REMOVE any standards or clauses which hold land uses to historic discharge levels or stocking rates</p> <p>AND REMOVE Rule 3.11.5.2(4)(c)</p> <p>AND AMEND riparian setback distances so they only apply to flat and rolling land and not to hill country</p>	Oppose in part	<p>activities to continue and to increase nitrogen. FFNZ proposes in its submission on Variation 1 that this ought to be on the basis of 15kgN for Rule 2 or some other reasonable “permitted baseline.” FFNZ is concerned that 18 stock units or 20kgN may be too high but would support if it was an appropriate measure of the permitted baseline.</p> <p>In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching.</p> <p>FFNZ supports the NRP as long as it is used as a reference point and not to grandparent nitrogen. FFNZ considers that flexibility ought to be provided for low intensity farming activities to increase nitrogen as a permitted activity (in its submission on Variation 1, FFNZ proposes that this threshold is set at 15kgN or an alternative reasonable “permitted baseline”).</p> <p>FFNZ considers that flexibility needs to be provided to use alternative models to Overseer, recognise</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>(i.e. on slopes over 15 degrees) AND DELETE the Rule 3.11.5.2 Nitrogen Reference Point AND AMEND to introduce a sub-catchment planned approach with the Farm Environment Plan as a monitoring tool AND AMEND Rule 3.11.5.2 to bring stock exclusion into line with the National Stock Exclusion requirements, which relate to exclusion of cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat land and rolling land, but not on hill country AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards AND REMOVE any provisions that hold land uses to historic discharge levels or stocking rates.</p>		<p>mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p>
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10621	Rule 3.11.5.2	<p>AMEND Rule 3.11.5.2(4) to read: "Where the property or enterprise is greater than 20 hectares: b. The diffuse discharge of nitrogen from the property or enterprise does not exceed <u>the greater of</u> either: i. the Nitrogen Reference Point; or ii. 15kg nitrogen/hectare/year; whichever is the lesser, over the whole property or enterprise when assessed in accordance with</p>	Oppose in part	<p>FFNZ considers that Rule 2 ought to enable farm activities to come up to 15kgN.</p> <p>While FFNZ supports the adoption of industry agreed GMP in principle, it is concerned that making this a standard of the permitted activity will not provide for a sufficiently tailored approach and considers that a better approach is to require these activities to obtain a simplified FEP as set out in FFNZ's submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Schedule B; and c. No part of the property or enterprise over 15 degrees slope is cultivated or grazed <u>except where the activity is managed in accordance with industry agreed good management practices</u> ; and d. No winter forage crops are grazed in situ <u>except where the activity is managed in accordance with industry agreed good management practices</u> ; and..."		
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10492	Rule 3.11.5.2	AMEND Rule 3.11.5.2 (4) b ii to read: "...b. The diffuse discharge of nitrogen from the property or enterprise does not exceed either:...whichever is the lesser, over the <u>effective hectares of the whole</u> property or enterprise assessed in accordance with Schedule B." AND ADD a NEW definition of 'effective hectares' to read: " <u>Effective hectares: means the area of a property or enterprise as measured in hectares which is used for the regular grazing of animals or growing of crops or activities ancillary to those uses and which specifically excludes indigenous forest, plantation forest, closed canopy scrubland and protected wetlands.</u> " AND ADD a NEW definition of 'protected wetland' to read: " <u>Protected wetland: for the purpose of the definition of 'effective hectares'</u>	Oppose	FFNZ considers that the discharge ought to be over the whole property to recognise mitigations to reduce nitrogen and because it is worried that historical actions will not be recognised. FFNZ also considers this avoids a lot of the uncertainty around the definition of effective area or wetlands. FFNZ is concerned that an effective area approach will result in uncertainty and likely impose significant cost for no net benefit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>means a wetland that is fenced to exclude stock or which is legally protected by a rule in a district or regional plan, condition of resource consent or other legally binding instrument such that it cannot be lawfully grazed, drained, cleared or otherwise modified without the consent of a local authority or third party and for which no such consent has been issued. This definition excludes any wetland constructed for the purpose of mitigating the effects of agricultural discharges on water quality."</u></p>		
<p>Gaudin, Philip and Pauline Submitter ID: 72820</p>	<p>PC1-9085</p>	<p>Rule 3.11.5.2</p>	<p>AMEND to incorporate Rules 3.11.5.1 and 3.11.5.2 into one rule AND AMEND to include land uses with stocking rates at or below 18 stock units as Permitted Activity and enable stocking rates to increase from current up to this standard AND/OR AMEND to relate stocking rate and/or nitrogen discharge to the natural capital of soils for sustainable production AND DELETE the 6 stock unit standard provision AND DELETE the 4.1 hectare threshold and replace it with up to 20 hectares AND AMEND to apply the national stock exclusion requirements which relate to exclusion of cattle, deer and pigs from permanently flowing</p>	<p>Support in part Oppose in part</p>	<p>FFNZ agrees that rules 1 and 2 ought to be provide reasonable flexibility for low intensity farming activities to continue and to increase nitrogen. FFNZ proposes in its submission on Variation 1 that this ought to be on the basis of 15kgN for Rule 2 or some other reasonable "permitted baseline." FFNZ is concerned that 18 stock units may be too high but would support if it was an appropriate measure of the permitted baseline.</p> <p>In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues.</p> <p>FFNZ considers that stock exclusion and set backs</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>waterbodies, through fencing on flat and rolling land but not on hill country AND AMEND to enable flexibility in land use, discharges and stocking rates up to these standards AND DELETE any standards or clauses which hold land uses to historic discharge levels or stocking rates AND AMEND to apply riparian setback distances only to flat and rolling land and not to hill country (i.e. slope > 15 degrees) AND REMOVE the Nitrogen Reference Point and the use of the OVERSEER Model from Rule 3.11.5.2 and PPC1 AND AMEND to adopt a sub-catchment approach to addressing contaminants that are relevant to each farm AND AMEND to take soil type and fertiliser history into account when determining nitrogen discharges from a property AND AMEND to use Farm Environment Plans to determine what would work best on each farm AND AMEND to use science to determine which contaminants are an issue in each sub-catchment. AND AMEND to ensure rules are effects- and science-based AND AMEND to provide for stock exclusion slope requirements to be</p>		<p>ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports the NRP as long as it is used as a reference point and not to grandparent nitrogen. FFNZ considers that flexibility ought to be provided for low intensity farming activities to increase nitrogen as a permitted activity (in its submission on Variation 1, FFNZ proposes that this threshold is set at 15kgN or an alternative reasonable "permitted baseline").</p> <p>FFNZ does not support input controls or nutrient allocation and is concerned that a proposal to take soil type and fertilise history into account would result in such an approach.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports the availability of funding and consideration of the resource reasonably available to the farm enterprise.</p> <p>FFNZ agrees that the timeframes need to be</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>no greater than 15 degrees as per the Clean Water Report (February 2017)</p> <p>AND AMEND the exclusion requirements for cattle on land between 3 and 15 degrees slope to only apply to all permanently flowing waterways greater than 1m wide</p> <p>AND AMEND to ensure Farm Environment Plans form the basis of PPC1</p> <p>AND AMEND to ensure Waikato Regional Council and central government continue to subsidise any waterway fencing</p> <p>AND AMEND to ensure actively managing stock across waterways be allowed but limited.</p> <p>AND AMEND to use the Clean Water Report (February 2017) for stock exclusion rules</p> <p>AND AMEND to ensure the rules focus on reducing impacts from intensive agriculture and not penalising extensive agriculture</p> <p>AND AMEND to remove timeframes and individualise them through consultation with farmers</p> <p>AND AMEND to enable farmers to be in charge of their own Farm Environment Plans, with input from Waikato Regional Council.</p>		<p>extended, particularly in light of the delay over the last two years.</p>
Gavins Limited Submitter ID: 73846	PC1-5513	Rule 3.11.5.2	REMOVE pasture from Rule 3.11.5.2 section on forage crop so it reads: "forage crop: means crops annual or	Support in part	FFNZ supports amendments to provide greater flexibility and provide for reasonable grazing, cropping and other farming activities. FFNZ agrees

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>biennial which are grown to be utilised by grazing or harvesting as a whole crop, <u>excluding any winter saved pastures</u>"</p> <p>AND CLARIFY what is considered winter and how winter is defined for Rule 3.11.5.2</p> <p>AND CLARIFY as to whether fencing requirement is 3 metres from the bed of a water body, as stated in Rule 3.11.5.2, or 1 metre as stated in Schedule C and referred to in other rules.</p>		with the amendment to the extent it provides greater flexibility but considers that Rule 2 requires further amendment.
Hamilton, Malibu Submitter ID: 74083	PC1-10300	Rule 3.11.5.2	AMEND Rule 3.11.5.2 to ensure that it complies with Section 70 RMA.	Support in part Oppose in part	FFNZ supports the use of hybrid land use and discharge rules for reasons including that diffuse discharges cannot be directly measured. Therefore, FFNZ considers that Rule 2 only needs to comply with section 70 to the extent that it is applicable to that type of rule.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5771	Rule 3.11.5.2	AMEND Rule 3.11.5.2 to include region wide Best Practicable Options to be followed on all rural properties, including those under 20 hectares.	Oppose	While FFNZ supports a BPO approach in principle and as a basis for selecting actions within a FEP, it does not support the approach proposed by this and other submitters which is effectively an input control approach. This is for reasons including that a tailored approach (not a one size fits all approach) is required and this will likely impose significant cost for no net benefit.
Hansen, Michael Submitter ID: 73151	PC1-10344	Rule 3.11.5.2	AMEND to combine Rules 3.11.5.2 and 3.11.5.1 into one rule AND DELETE from Rule 3.11.5.2 the 6 stock unit per hectare standard AND AMEND to include as Permitted Activity land uses with stocking rates at or below 18 stock units and enable stocking rates to increase from	Support in part Oppose in part	FFNZ agrees that rules 1 and 2 ought to be provide reasonable flexibility for low intensity farming activities to continue and to increase nitrogen. FFNZ proposes in its submission on Variation 1 that this ought to be on the basis of 15kgN for Rule 2 or some other reasonable "permitted baseline." FFNZ is concerned that 18 stock units may be too high but would support if it was an appropriate measure of

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>current up to this standard, AND/OR AMEND to relate stocking rate and/or nitrogen discharge to the natural capital of soils for sustainable production/ sustainable farming AND AMEND to apply the national stock exclusion requirements which relate to exclusion of cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat land and rolling land, but not on hill country</p> <p>AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards</p> <p>AND DELETE any standards or clauses which hold land uses to historic discharge levels or stocking rates</p> <p>AND DELETE Rule 3.11.5.2 (4)(c)</p> <p>AND AMEND riparian setback distances so they only apply to flat and rolling land and not to hill country (i.e. on slopes greater than or equal to 15 degrees).</p> <p>AND AMEND the stock exclusion requirements to be consistent with the government's Clean Water Report (February 2017)</p> <p>AND AMEND the stock exclusion slope requirements to no greater than 15 degrees as per the Clean Water Report (February 2017)</p>		<p>the permitted baseline.</p> <p>In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching.</p> <p>FFNZ supports the NRP as long as it is used as a reference point and not to grandparent nitrogen. FFNZ considers that flexibility ought to be provided for low intensity farming activities to increase nitrogen as a permitted activity (in its submission on Variation 1, FFNZ proposes that this threshold is set at 15kgN or an alternative reasonable “permitted baseline”).</p> <p>FFNZ considers that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum</p>

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			<p>AND AMEND the exclusion requirements for cattle and deer on land between 3 and 15 degree slopes so that they apply only to all permanently flowing waterbodies 1 metre wide or greater</p> <p>AND AMEND Farm Environment Plan requirements to align the thresholds for mandatory stock exclusion to the nationally recommended standards (Clean Water Report February 2017), so that stock exclusion only applies up to a slope of 15 degrees for deer and cattle and only applies to waterbodies 1 metre or wider for deer and cattle on land between 3 and 15 degrees slope</p> <p>AND AMEND the Farm Environment Plan requirements so that stock exclusion fencing is required above the 15 degree threshold for intensive farming operations (>18su/ha), for example winter cropping and strip grazing of dairy cows on hill country</p> <p>AND REPLACE the [Farm Environment Plan and relevant provisions] input standards (such as riparian setbacks and limitations on cultivation) with mitigations set on a farm by farm basis and focused on management of critical source areas</p> <p>AND AMEND the rules to focus on reducing impacts from intensive agriculture >18su/ha rather than on</p>		<p>standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP.</p> <p>FFNZ supports the availability of funding and</p>

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			<p>extensive agriculture AND AMEND so that Farm Environment Plans are produced by the landowner with Council guidance and support AND DELETE Schedule 1(A)(5)(a) AND REPLACE with an approach that enables flexibility in nitrogen leaching from hill country sheep and beef farming, and land uses which are low impact (at or below 20kgN/ha/yr) OR apply natural capital allocation AND REMOVE the timeframes, AND REPLACE with an approach that sets timeframes through consultation with the farmer taking into account their financial constraints and the sensitivity of the waterbody to any impact.</p>		<p>consideration of the resource reasonably available to the farm enterprise and agrees that timeframes ought to be extended particularly in light of the two year delay following notification of PC1.</p> <p>FFNZ supports an approach that is not based on allocation but that provides flexibility for low nitrogen discharges to increase as a permitted activity.</p>
<p>Hill Country Farmers Group Submitter ID: 73321</p>	<p>PC1-7845</p>	<p>Rule 3.11.5.2</p>	<p>AMEND Rule 3.11.5.2 to read: "The use of land for farming activities (excluding commercial vegetable production) and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water where the property area is greater than 4.1 hectares, and has more than 6 and less than 18 stock units per hectare as at 30 June 2016 or is used for arable cropping, is a permitted activity subject to the following</p>	<p>Support in part</p>	<p>FFNZ considers that Rule 2 needs to provide greater flexibility for small or low intensity properties. While it considers that this ought to be achieved through the amendments it proposed in its submission on Variation 1 e.g. the ability to increase to 15kgN or a similar permitted baseline, FFNZ would support any alternative that provides greater flexibility. On this basis it would support 18 stock units as proposed.</p> <p>FFNZ also considers that cultivation above slopes of 15 or 25 degrees ought to be deleted and considered in an FEP but in the alternative would support the proposal to limit this to break feeding as a means to provide flexibility.</p>

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			<p>conditions:</p> <ol style="list-style-type: none"> 1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u> and Conditions 3(e) and 4(e) of this Rule; and 3. Where the property area is less than or equal to 20 hectares: <ol style="list-style-type: none"> a. The farming activities do not form part of an enterprise being undertaken on more than one property; and b. Where the land is: <ol style="list-style-type: none"> i. used for grazing livestock, the stocking rate of the land is no greater than the stocking rate of the land at 22 October 2016; or ... e. Where the property or enterprise contains any of the water bodies listed in Schedule C, new fences installed after 22 October 2016 <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u> must be located to ensure cattle, horses, deer and pigs cannot be within three metres of the bed of the water body (excluding constructed wetlands and drains). 		<p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>4. Where the property or enterprise area is greater than 20 hectares:</p> <p>a. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and</p> <p>b. The diffuse discharge of nitrogen from the property or enterprise does not exceed either:</p> <p>i. the Nitrogen Reference Point; or</p> <p>ii. 15kg nitrogen/hectare/year; whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B; and</p> <p>c. No part of the property or enterprise over 15²⁵ degrees slope is cultivated or grazed unless effects of diffuse discharges can be mitigated; and</p> <p>d. No winter forage crops are grazed in situ; and</p> <p>e. Where the property or enterprise contains any of the water bodies listed in Schedule C:</p> <p>i. There shall be no cultivation within 5 metres of the bed of the water body unless effects of diffuse discharges can be mitigated; and</p> <p>ii. New fences installed after 22 October 2016 for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs must be located to ensure cattle, horses, deer and</p>		

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			pigs cannot be within three metres of the bed of the water body (excluding constructed wetlands and drains); and..."		
Hurley, Peter James Submitter ID: 71391	PC1-1089	Rule 3.11.5.2	<p>AMEND Rule 3.11.5.2 to ensure consistency with Policy 4.</p> <p>AND AMEND to enable small, low intensity and low-risk farming activities to continue to exist, to establish, and are enabled to be flexible.</p> <p>AND AMEND so that Rule 3.11.5.1 and Rule 3.11.5.2 are incorporated into one rule.</p> <p>AND AMEND to include as a permitted activity land uses with stocking rates at or below 18 stock units and enable stocking rate to increase from current up to this standard;</p> <p>AND OR AMEND to relate soil and geology ie LUC I, II, III 20 stocking units, LUC IV, V 18 stock units; LUC VI, VII 16 stock units;</p> <p>AND OR AMEND LUC I 25kg/N/ha/yr, LUC II 20kg/N/ha/yr, LUC III 18kg/N/ha/yr, LUC IV 16kg/N/ha/yr, LUC V 12kg/N/ha/yr, LUC VI 10kg/N/ha/yr, LUC VII 8kg/N/ha/yr (or viable alternative);</p> <p>AND DELETE 6 stock unit standard;</p> <p>AND DELETE 4.1ha and provide for up to 20ha:</p> <p>AND AMEND to apply national stock exclusion requirements which relate</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that rules 1 and 2 ought to be provide reasonable flexibility for low intensity farming activities to continue and flexibility to increase nitrogen. FFNZ proposes in its submission on Variation 1 that this ought to be on the basis of 15kgN for Rule 2 or some other reasonable "permitted baseline." FFNZ is concerned that 18 stock units may be too high but would support if it was an appropriate measure of the permitted baseline.</p> <p>In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching.</p> <p>FFNZ supports the NRP as long as it is used as a reference point and not to grandparent nitrogen. FFNZ considers that flexibility ought to be provided for low intensity farming activities to increase</p>

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			<p>to the exclusion of stock from water bodies through fencing flat and rolling land but not hill country. AND AMEND to enable flexibility in land use, discharges, and stocking rates up to the above standards. AND DELETE any standards or clauses which hold land uses to historic discharge levels or stocking rates; AND DELETE Standard 4(c); AND AMEND riparian setback distances so they only apply to flat and rolling land and not hill country. AND DELETE provisions that relate to excluding cattle from water bodies through permanent fencing in their entirety. OR, if not deleted in their entirety AMEND so that the requirement to exclude cattle through permanent fencing is tailored on a farm by farm basis where there is a proven water quality issue in relation to stock access to water bodies. Allow flexibility to provide for alternative approaches to achieve the same outcome. AND AMEND so that the ability to muster cattle through a water body without requiring a formed stock crossing structure when crossing less than three times weekly. AND make any consequential amendments.</p>		<p>nitrogen as a permitted activity (in its submission on Variation 1, FFNZ proposes that this threshold is set at 15kgN or an alternative reasonable “permitted baseline”).</p> <p>FFNZ considers that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ’s submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ’s submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9336	Rule 3.11.5.2	AMEND Rule 3.11.5.2 by adding the words: " <u>Note: Rule 3.11.5.2 shall be the subject of a detailed effectiveness review at 2020 and 2024.</u> "	Oppose	FFNZ considers that the timeframes are not appropriate (particularly in light of the delays over the past two years), is concerned that the effectiveness of Rule 2 may not be able to be determined (i.e. effects of activities under this rule will unlikely to be able to be isolated or assessed) and there is no need to treat this rule different from the other rules. FFNZ also considers that information gained through simplified FEPs may address this submitter's concerned (noting that this information should be treated as confidential and privacy maintained, where appropriate).
Matamata-Piako District Council Submitter ID: 73419	PC1-3700	Rule 3.11.5.2	AMEND Rule 3.11.5.2 after: working with sector groups to determine a realistic threshold to apply as a performance standard as a permitted activity and confirming that the approach meets the section 32 efficiency and effectiveness tests (including with respect to separation distances, restriction on winter forage crops, and reporting requirements). AND AMEND to clarify how '6 stock units per hectare' was arrived at. AND AMEND to clarify the meaning and application of 'is used for arable cropping' AND AMEND Rule 3.11.5.2(3)(a) to read as follows: "The farming activities do not form part of an enterprise being undertaken on more than one property <u>within the Waikato River and Waipā River catchments.</u> " AND CONSIDER the appropriateness of the 22 October	Support in part	<p>FFNZ considers that Rule 2 ought to provide a reasonable permitted baseline (which sounds similar to the realistic threshold this submitter refers to) up to which small or low intensity properties can increase.</p> <p>FFNZ considers the 6 stock units per hectare threshold needs to be raised and the threshold of 15kgN is appropriate in the absence of a better metric (which FFNZ would support if it was founded a robust section 32 assessment).</p> <p>FFNZ considers that the definition of arable cropping needs to be clarified and ensure it is reasonable, practical and affordable.</p> <p>FFNZ agrees that the NRP ought to be a reference point and not used to grandparent nitrogen.</p> <p>FFNZ considers that the requirement that "no part of a property over 15 degrees is cultivated or grazed" ought to be clarified by deleting it and considering this through a simplified FEP.</p>

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			2016 date AND AMEND to clarify how the Nitrogen Reference Point is to be used (ie as a standard or a guideline) in Point 4a AND AMEND to clarify what 4x 'No part of the property or enterprise over 15 degrees slope is cultivated or grazed' means for compliance and enforcement.		
Matira Sub Catchment Group Submitter ID: 74148	PC1-9308	Rule 3.11.5.2	AMEND Rule 3.11.5.2 to apply the National Policy Statement for Freshwater Management AND AMEND to adopt the Clean Waters policy is the standard.	Oppose	FFNZ considers that a tailored and bespoke approach is needed as set out in its submission on Variation 1.
Miraka Limited Submitter ID: 73492	PC1-8890	Rule 3.11.5.2	RETAIN Rule 3.11.5.2	Oppose in part	FFNZ considers that Rule 2 requires amendment as set out in its submission on Variation 1 e.g. flexibility to increase to 15kgN (or some other appropriate permitted baseline), simplified FEPs.
Nelson Farms Partnership Submitter ID: 73054	PC1-8747	Rule 3.11.5.2	AMEND Rule 3.11.5.2 stock exclusion requirements to be consistent with the Clean Water Report (February 2017) AND AMEND to exclude stock from permanently flowing waterbodies on flat and rolling land, but not on hill country (slope >15 degrees) AND AMEND riparian setback distances to only apply to flat and rolling land, but not hill country (slope >15 degrees) AND AMEND to require exclusion of cattle and deer on slopes between 3 and 15 degrees only where there are permanently flowing waterbodies 1m	Support in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation. FFNZ agrees the timeframes ought to be extended (particularly in light of the two year delay since notification of PC1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>wide or greater AND AMEND to extend the timeframes and give certainty for land with high erosion risk to ensure investment in fencing is not wasted if future plan changes require retirement to forestry AND AMEND to allow Farm Environment Plans to provide mitigations against contaminants relevant to each farm, rather than a blanket approach AND DELETE any provisions that hold land use to historic discharge levels or stocking rates AND DELETE the Nitrogen Reference Point from PPC1 AND DELETE the use of the OVERSEER Model from PPC1 AND AMEND to adopt a sub-catchment approach to addressing contaminants relevant to each farm AND AMEND so that, if nitrogen discharges do have to be allocated, the allocation system is based on the natural capital of soils and the water quality outcomes for each sub-catchment AND REMOVE allocation based on 2014/15 or 2015/16 land use or grandparenting, especially for lower leaching land uses such as drystock AND AMEND to use Farm Environment Plans to determine what works best for each farm, science to</p>		<p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ’s submission on Variation 1.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults. FFNZ also considers that the benchmark years need to be wider than just 2014/15 and 2015/16 which are not reflective of normal farming activities due to factors such as drought at the time.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>Having said this, FFNZ agrees that the land owner</p>

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			<p>determine which contaminants are an issue in each sub-catchment, and effects-based provisions AND AMEND to reconsider the use of Overseer modelled nitrogen discharge numbers to determine resource consent status and compliance AMEND the Rule 3.11.5.2 Farm Environment Plan requirements to reduce the thresholds for mandatory stock exclusion to nationally recommended standards (Clean Water Report, February 2017, with stock exclusion only applying to slopes of up to 15 degrees for deer and cattle, and only applying to waterbodies 1m or wider for cattle and deer on land between 3 and 15 degrees slope AND RETAIN the requirement for fencing on land above 15 degrees for intensive farming operations (>18su/ha) AND REPLACE input standards such as riparian setbacks and limitation on cultivation with mitigations that are set on a farm by farm basis and focused on management of critical source areas AND AMEND to focus on reducing impacts from intensive agriculture (>18su/ha) rather than applying inappropriate rules to extensive agriculture</p>		<p>needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND to allow landowners to produce their own Farm Environment Plans with guidance and support from Waikato Regional Council</p> <p>AND DELETE Nitrogen Reference Point discharge restrictions and enable flexibility in nitrogen leaching from hill country sheep and beef farming and low impact land uses (< 20kgN/ha/yr) or apply a natural capital allocation</p> <p>AND DELETE the timeframes and set individual timeframes based on consultation with landowners and the sensitivity of the waterbody.</p>		
New Zealand Grain and Seed Trade Association Submitter ID: 71229	PC1-1656	Rule 3.11.5.2	<p>AMEND Rule 3.11.5.2 4(e)(i) to replace the proposed 5 metres setback distance with the current industry agreed cultivation setback distance of 2 metres from permanent waterways</p> <p>AND AMEND Rule 3.11.5.2 4c to further clarify AND OR define how the 15 degree slope restriction will be interpreted (i.e. part of the paddock and apply to all the paddock, the paddock average, how and who calculated) and what are accepted mitigations above 15 degrees slope</p> <p>AND CLARIFY the science used to support the 15 degree slope gradient being the cut off measurement</p> <p>AND DELETE Rule 3.11.5.2 4d, IF not deleted then AMEND Rule 3.11.5.2 to clarify and interpret</p>	Support in part	<p>FFNZ considers that all stock exclusion and setback minimum standards ought to be set out in Schedule C. It refers to its submission on Variation 1 and considers that the minimum setback for cultivation ought to be 1m. It would support 2m as proposed by this submitter in the alternative (and event it is not successful with 1m) on the basis that it provides greater flexibility than 5m.</p> <p>FFNZ considers that the uncertainty around assessment is slope is avoided if paragraph 4(c) is deleted and instead a critical source area assessment is undertaken in the context of a simplified FEP (as set out in FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that paragraph 4(d) ought to be deleted and if not clarification ought to be provided as suggested by the submitter but that clarification should be on the basis of a robust section 32</p>

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			how no winter forage crops in situ would work, what is a forage crop, how this is determined, when is winter and who determines this period.		assessment.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4643	Rule 3.11.5.2	DELETE Rule 3.11.5.2(4)(b)(ii).	Oppose in part	FFNZ considers that 15kgN ought to be retained in paragraph 4(b)(ii) but only if this is treated as a threshold up to which a farming activity can increase as a permitted activity as set out in FFNZ's submission on Variation 1.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11859	Rule 3.11.5.2	AMEND Rule 3.11.5.2 by adding the words: " <u>Note: Rule 3.11.5.2 shall be the subject of a detailed effectiveness review at 2020 and 2024.</u> "	Oppose	FFNZ considers that the timeframes are not appropriate (particularly in light of the delays over the past two years), is concerned that the effectiveness of Rule 2 may not be able to be determined (i.e. effects of activities under this rule will unlikely to be able to be isolated or assessed) and there is no need to treat this rule different from the other rules. FFNZ also considers that information gained through simplified FEPs may address this submitter's concern (noting that this information should be treated as confidential and privacy maintained, where appropriate).
Ngati Haua Tribal Trust Submitter ID: 73025	PC1-1969	Rule 3.11.5.2	AMEND the Nitrogen Reference Point in PPC1 to provide for the long term averaging of nitrogen losses. AND AMEND to include alternative tools such as the use of the natural capital approach. AND AMEND to utilise tools such as MENUs as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model. AND AMEND where Overseer is to	Support in part Oppose in part	FFNZ supports the calculation of the NRP on the basis of a five year rolling average and with a longer benchmarking period and with flexibility for the use of Overseer as set out in FFNZ's submission on Variation 1. FFNZ considers that there is no robust "natural capital" approach currently available and is concerned that this will result in an allocation approach based on LUC (which FFNZ opposes). FFNZ agrees that alternative options or models to Overseer ought to be provided for.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>be used as part of the creation of solutions, calculations must be used as a guide only and the focus to be on the trends that are used. AND AMEND to address the implications of stock exclusion on steeper and more extensive hill country. AND AMEND by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority. AND AMEND to consider alternative solutions on steep land such as water reticulation installation. AND AMEND to match land use capability rather than directly to slope. AND CONSIDER an industry wide capability assessment to assess who will complete the plans. AND AMEND to show land owners and the industry how these are to be constructed and how the gains are quantified. AND AMEND to provide clarity as to how the monitoring of these plans will be undertaken and who will pay for this.</p>		<p>FFNZ considers the stock exclusion minimum standards ought to be amended to provide for hill country and extensive farming e.g. assess the requirements on 18 stock units (or a similar approach that looks at intensity) as set out in FFNZ's submission on Variation1.</p> <p>FFNZ does not support matching land use to capability because there is no measure of capability that would take into account all natural capital or no measure that is a reasonable proxy for contaminant discharges.</p>
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8083	Rule 3.11.5.2	DELETE Rule 3.11.5.2 [Rule 2 in the alternative approach in the submission] and combine with Rule 3.11.5.1 [Rule 1 in the alternative	Oppose	FFNZ does not support the input approach and input standards proposed by this submitter for reasons including that a “one size fits all” approach is not appropriate, will impose significant cost for no

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			approach in the submission].		net benefit and a tailored and proportionate approach is required (FFNZ refers to its submission on Variation 1, in particular its proposal for FEPs and MPA).
Primary Land Users Group Submitter ID: 71427	PC1-11173	Rule 3.11.5.2	<p>AMEND Rule 3.11.5.2 to read: "The use of land for farming activities ...where the property area is greater than 4.1 hectares, and has more than <u>6 and less than 18 stock units per hectare</u> or is used for arable cropping, is a permitted activity subject to the following conditions:</p> <p>1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u> and conditions 3(e) and 4(e) of this Rule; and</p> <p>3. Where the property area is less than or equal to 20 hectares:</p> <p>...</p> <p>b. Where land is:</p> <p>i. used for grazing livestock, the stocking rate of the land is no greater than the stocking rate of the land at 22 October 2016; or</p> <p>ii. not used for grazing livestock, the land use has the same or lower diffuse discharges of nitrogen, phosphorus, sediment or microbial</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports properties obtaining an NRP provided it is only used as a reference point and not to grandparent nitrogen and provided flexibility is provided for using Overseer as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that a "permitted baseline" ought to be provided, either 15kgN (with farming activities able to increase up to it) or some other reasonable measure). FFNZ would support that baseline being 18 stock units if it was supported by the science.</p> <p>FFNZ agrees that cultivation and grazing of slopes above 15 degrees needs to be provided for and</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>pathogens as the land use at 22 October 2016; and</p> <p>...</p> <p>e. Where the property or enterprise contains any of the water bodies listed in Schedule C, new fences installed after 22 October 2016 <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u> must be located...</p> <p>4. Where the property or enterprise area is greater than 20 hectares:</p> <p>a. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and</p> <p>b. The discharge of nitrogen from the property or enterprise does not exceed either:</p> <p>i. the Nitrogen Reference Point; or</p> <p>ii. 15kg nitrogen/hectare/year; whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B; and</p> <p>c. No part of the property or enterprise over 15 degrees slope is cultivated or grazed unless effects of diffuse discharges can be mitigated; and</p> <p>...</p> <p>e. where the property or enterprise contains any of the water bodies listed in Schedule C:</p>		<p>FFNZ considers this can be managed through a simplified FEP (see FFNZ's submission on Variation 1).</p>

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			<p>i. There shall be no cultivation within 5 metres of the bed of the water body <u>unless effects of diffuse discharges can be mitigated</u>; and</p> <p>ii. New fences installed after 22 October 2016 <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u> must be located...</p> <p>5. For all properties greater than 4.1 hectares, from 31 March 2019, in addition to the requirement of Schedule A, the following information must be provided to the Waikato Regional Council by 1 September each year:</p> <p>a. Annual stock numbers; and</p> <p>b. Annual fertiliser use; and</p> <p>c. Annual brought in feed."</p>		
Raukawa Charitable Trust Submitter ID: 74073	PC1-10587	Rule 3.11.5.2	AMEND Rule 3.11.5.2 by ADDING the words: " <u>Note: Rule 3.11.5.2 shall be the subject of a detailed effectiveness review at 2020 and 2024.</u> "	Oppose	FFNZ considers that the timeframes are not appropriate (particularly in light of the delays over the past two years), is concerned that the effectiveness of Rule 2 may not be able to be determined (i.e. effects of activities under this rule will unlikely to be able to be isolated or assessed) and there is no need to treat this rule different from the other rules. FFNZ also considers that information gained through simplified FEPs may address this submitter's concerned (noting that this information should be treated as confidential and privacy maintained, where appropriate).
Ravensdown Limited Submitter ID:	PC1-10140	Rule 3.11.5.2	RETAIN the permitted activity status of Rule 3.11.5.2 while addressing the following:	Support in part	FFNZ agrees that a permitted activity status ought to be retained.

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74058			<p>i. AMEND to simplify the conditions to ensure no checks or verifications are required and so a resource user has certainty that their activity is permitted, or requires a consent;</p> <p>ii. DELETE Condition 3b.ii</p> <p>iii. AMEND Schedule B to allow for a Nitrogen Reference Point to be determined over a four year period, and averaged over those four years.</p> <p>iv. AMEND to introduce a reference file approach to allow the 15kgN cap to move with updates of the OVERSEER Model.</p>	Oppose in part	<p>FFNZ agrees that certainty is required but considers that a simplified FEP ought to be required and that this can work on the basis that it is prepared by a certified farm environment planner with no control over content by Council.</p> <p>FFNZ considers that clause 3b(ii) can be retained but needs to be clarified as set out in its submission on Variation 1.</p> <p>FFNZ agrees that Overseer version change needs to be provided for and addressed, but is concerned that a reference file approach may have unintended consequences and may not be sufficiently robust. If it was adopted there would need to be sufficient hypothetical files and this may not be pragmatic given the size of the catchment and huge variation in things like geographical and climate characteristics and farm types and systems.</p>
South Waikato District Council Submitter ID: 72892	PC1-4206	Rule 3.11.5.2	<p>Confirm that the approaches in Rule 3.11.5.2 introductory sentence, (3)(b)(i) and (ii), (4)(a), (4)(c), (4)(e)(i) and (ii), 4(d), 5(a)-(c) meet the section 32 efficiency and effectiveness tests, otherwise REMOVE the standards AND AMEND Rule 3.11.5.2(3)(a) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property <u>within the Waikato River and Waipā River catchments.</u>" AND CONSIDER alternative approaches that incorporate the use of performance standards for the</p>	Support in part	<p>FFNZ agrees that the standards must meet a section 32 assessment and has concerns that they will impose significant cost for no net benefit (and for this reason proposes that they are amended as set out in FFNZ's submission on Variation 1).</p> <p>FFNZ has no issue with clarifying that the rule applies to the Waikato River and Waipa River catchments.</p> <p>FFNZ is concerned that performance standards will be akin to input controls and considers that this will not provide sufficient flexibility and will likely impose significant cost. FFNZ prefers the approach of a simplified FEP as set out in FFNZ's submission on Variation 1.</p>

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			range of primary production activities that are able to establish as 'small and low intensity farming activities' (currently defined under Rules 3.11.5.1 and 3.11.5.2) throughout the region.		
Stark, Steven and Theresa Submitter ID: 73721	PC1-5177	Rule 3.11.5.2	AMEND Rule 3.11.5.2 as follows: "... and has more than <u>€18 stock units per hectare</u> 4. c) No part of the property or enterprise over 15 degrees slope is cultivated or grazed <u>arable cropped</u> ". AND AMEND Rule 3.11.5.2 by DELETING any standards or clauses which hold land uses to historic discharge levels or stocking rates.	Support in part	FFNZ agrees that the number of stock units ought to be greater than 6. It would support 18 if this was supported by a robust section 32 assessment. FFNZ considers that paragraph 4(c) ought to be deleted or, in the event that it is not, it ought to be amended a proposed by this submitter (or something similar) to narrow its application and provide greater flexibility for farming activities.
Stokman, Mark and Sharon Submitter ID: 73976	PC1-6689	Rule 3.11.5.2	AMEND Rule 3.11.5.2 to be consistent with Policy 4 and enable small and low intensity and low risk farming activities to continue if existing, be established and be flexible AND AMEND to merge Rule 3.11.5.1 and 3.11.5.2 into one rule AND AMEND to include as a Permitted Activity land uses with stocking rates at or below 18 stock units and enable the stocking rate to increase from current up to this standard OR AMEND to relate stocking rates to soil and geology, ie 20 stock units for Land Use Capability classes 1, 2 and 3; 18 stock units for Land Use Capability class 4; and 16 stock units	Support in part Oppose in part	FFNZ agrees that rules 1 and 2 ought to be provide reasonable flexibility for low intensity farming activities to continue and flexibility to increase nitrogen. FFNZ proposes in its submission on Variation 1 that this ought to be on the basis of 15kgN for Rule 2 or some other reasonable "permitted baseline." FFNZ is concerned that 18 stock units may be too high but would support if it was an appropriate measure of the permitted baseline. In principle, FFNZ considers that there could be merit in combining rules 1 and 2. However, it also sees merit in having them as separate rules because it considers that there is merit in properties over 20ha obtaining a simplified FEP on the basis that they may be low for nitrogen but could be high for other contaminants and there would like be merit in having a FEP to address those issues.

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			<p>for Land Use Capability class 6 or 7 OR AMEND to set nitrogen loading limits such as 25kg/N/ha/yr for Land Use Capability class 1; 20kg/N/ha/yr for Land Use Capability class 2; 18kg/N/ha/yr for Land Use Capability class 3; 16kg/N/ha/yr for Land Use Capability class 4; 12kg/N/ha/yr for Land Use Capability class 5; 10kg/N/ha/yr for Land Use Capability class 6; and 8kg/N/ha/yr for Land Use Capability class 7 (or viable alternatives) AND DELETE the 6 stock unit standard AND DELETE the 4.1 hectares limit and provide for up to 20 hectares AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards AND DELETE any standards or clauses which hold land uses to historic discharges levels or stocking rates AND AMEND PPC1 to apply national stock exclusion requirements which relate to exclusion of cattle, deer and pigs from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier or other technologies) on flat land and rolling land but not on hill country AND DELETE clause 4(c) of Rule 3.11.5.2.</p>		<p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching.</p> <p>FFNZ supports the NRP as long as it is used as a reference point and not to grandparent nitrogen. FFNZ considers that flexibility ought to be provided for low intensity farming activities to increase nitrogen as a permitted activity (in its submission on Variation 1, FFNZ proposes that this threshold is set at 15kgN or an alternative reasonable “permitted baseline”).</p> <p>FFNZ considers that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ’s submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND riparian setback distances so they only apply to flat and rolling land and not hill country (ie slope <= 15 degrees)</p> <p>AND DELETE the requirements in Rule 3.11.5.2 relating to excluding cattle from waterbodies through permanent fencing</p> <p>AND AMEND Rule 3.11.5.2, where there is a scientifically proven water quality issue related to stock access to waterbodies, so the requirement to exclude cattle through permanent fencing is tailored on a farm by farm, district by district and sub-catchment basis, ensuring flexibility to provide for alternative management arrangements for certain land uses and terrains to achieve the same outcome</p> <p>AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing</p> <p>AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week.</p>		<p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p>
<p>Taupo District Council Submitter ID: 74207</p>	<p>PC1-8164</p>	<p>Rule 3.11.5.2</p>	<p>AMEND Rule 3.11.5.2 to ensure that stocking rates and discharges are based on a 5 year average prior to 22 October 2016.</p>	<p>Support in part</p>	<p>FFNZ agrees that calculation of the NRP ought to be on a five year rolling average but considers that it needs to apply moving forwards. FFNZ also agrees that the benchmark period ought to be wider</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					than just the two years 2014/15 and 2015/16.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9355	Rule 3.11.5.2	DELETE from Rule 3.11.5.2 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.	Oppose	FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8425	Rule 3.11.5.2	AMEND Rule 3.11.5.2(3)(d) to ensure that landowners are required to provide Council with information regarding the land use activities that were occurring on 22 October 2016 and annually thereafter in a way that can be verified to meet the requirements of Rule 3.11.5.2(3)(b). AND AMEND to ensure that non-compliance with Rule 3.11.5.2(3) and (4) is a non-complying activity.	Oppose in part	FFNZ agrees that clarification as to the information required ought to be provided. FFNZ considers paragraph d ought to apply to current activities and ought to be provided on request, as with information set out in paragraph 5 (see FFNZ's submission on Variation 1). FFNZ does not agree that non compliance with Rule 2 should be a non complying activity. FFNZ is concerned that this will impose significant cost for no net benefit and considers that it ought to default to a RD activity.
Timberlands Limited Submitter ID: 73036	PC1-3431	Rule 3.11.5.2	AMEND Rule 3.11.5.2 to read as: "The use of land for farming activities... is a permitted activity subject to the following conditions: 1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and <u>The property complies with the region-wide good management practice for pastoral land use;</u> and Either: 3. ..."	Oppose	While FFNZ supports industry agreed GMP, FFNZ considers that a blanket requirement through a permitted activity standard is an inflexible and unreasonable approach. FFNZ considers that a more appropriate approach is through assessment of critical source areas and identification of MPA through tailored and proportionate simplified FEPs as set out in FFNZ's submission on Variation 1.

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Treweek, Glen Submitter ID: 72747	PC1-5784	Rule 3.11.5.2	<p>AMEND Rule 3.11.5.2 to read: "Rule 3.11.5.2 - Permitted<u>Discretionary</u> Activity Rule ... The use of land for farming activities (excluding commercial vegetable production) and the ... area is greater than 4.4<u>10</u> hectares for commercial vegetable activities, or greater than 40 hectares for all other farming activities , and has more than 6 stock units per hectare or is used for arable cropping is a permitted<u>discretionary</u> activity ...:</p> <p>1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and <u>2. A Farm Environment Plan has been prepared for the property in accordance with Schedule 1; and</u> 2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C and Conditions 3(e) and 4(e) of this Rule<u>the risk based assessment and subsequent targets contained in the Farm Environment Plan; and</u> 3. Where the property area is less than or equal to 20 hectares; a. The farming activities do not form part of an enterprise being undertaken on more than one property; and b. Where the land is: i. used for grazing livestock, the</p>	Oppose	<p>FFNZ is concerned that the proposed rule framework will impose significant cost for no net benefit. It considers that making it more stringent i.e. discretionary activity, will impose even greater cost.</p> <p>FFNZ is also concerned that a “reference land activity approach” is akin to input controls that will not provide sufficient flexibility and tailoring of actions and this will result in even greater cost.</p> <p>FFNZ is also concerned that the timeframes in PC1 are already too tight (particularly in light of the two year delay following notification of PC1) and will impose significant cost. FFNZ does not support making them stricter.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>stocking rate of the land is no greater than the stocking rate of the land at 22 October 2016; or</p> <p>ii. not used for grazing livestock, the land use has the same or lower diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens as the land use at 22 October 2016; and</p> <p>c. Upon request, the land owner shall obtain and provide to the Council independent verification from a Certified Farm Environment Planner that the use of land is compliant with either b)(i) or b)(ii) above; and</p> <p>d. Upon request from the Council, a description of the current land use activities shall be provided to the Council; and</p> <p>e. Where the property or enterprise contains any of the water bodies listed in Schedule C, new fences installed after 22 October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within three metres of the bed of the water body (excluding constructed wetlands and drains).</p> <p>4. Where the property or enterprise area is greater than 20 hectares;</p> <p>a. A Nitrogen Reference PointReference Land-use description is produced for the property or enterprise in conformance with Schedule B; and</p>		

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			<p>b. The diffuse discharge of nitrogen from the property or enterprise does not exceed either; i. the Nitrogen Reference Point; or ii. 15kg nitrogen/hectare/year; whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B; and <u>Farming activities have not deviated substantially from those described in the Reference Land-use description, as assessed by a certified Farm Environment Plan Auditor; and</u> c. No part of the property or enterprise over 15 degrees slope is cultivated or grazed ; and d. No winter forage crops greater than 20 ha in area are grazed in situ; and e. Where the ... C: i. There shall ...; and ii. New fences installed after 22 October 2016<u>this plan is made operative must be located ...; and...</u> <u>...Resource consent has been granted with the specified timeframes:</u> 1. <u>Three years after this Plan is made operative for properties or enterprise in Priority 1 sub-catchment listed in Table 3.11-2, and properties or enterprise with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>2. Five years after this plan is made operative for properties or enterprise in Priority 1 sub-catchment listed in Table 3.11-2;</u></p> <p><u>3. Eight years after this plan is made operative for properties or enterprise in Priority 1 sub-catchment listed in Table 3.11-2; Subject to the following conditions:"</u></p>		
Waikato and Waipa Branches of the New Zealand Deer Farmers Association Submitter ID: 74008	PC1-9380	Rule 3.11.5.2	<p>AMEND Rule 3.11.5.2(2) to read: "Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C and Conditions 3 (e) and 4 (e) of this Rule according to a schedule of work as identified in a Farm Environment Plan; and..."</p> <p>AND AMEND Rule 3.11.5.2 to give effect to objectives and policies including Policy 1 and Policy 4, and enable activities with lower contaminant discharges including nutrient discharges to continue or to be established.</p>	Support in part	While FFNZ considers there is merit in minimum standards (provided they are reasonable and as proposed in FFNZ's submission on Variation 1), FFNZ considers that a tailored approach through FEPs is appropriate. FFNZ considers that different or more stringent mitigations could be considered in that context.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3522	Rule 3.11.5.2	<p>AMEND Rule 3.11.5.2 by ADDING the words: "<u>Note: Rule 3.11.5.2 shall be the subject of a detailed effectiveness review at 2020 and 2024.</u>"</p>	Oppose	FFNZ considers that the timeframes are not appropriate (particularly in light of the delays over the past two years), is concerned that the effectiveness of Rule 2 may not be able to be determined (i.e. effects of activities under this rule will unlikely to be able to be isolated or assessed) and there is no need to treat this rule different from the other rules. FFNZ also considers that information gained through simplified FEPs may address this submitter's concerned (noting that this information should be treated as confidential and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Waikato Regional Council Submitter ID: 72890	PC1-3117	Rule 3.11.5.2	<p>AMEND Rule 3.11.5.2 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1</p> <p>AND AMEND Rule 3.11.5.2 (2) to read: "Cattle, horses, deer and pigs are excluded from water bodies in conformance<u>The use of land for farming activities complies with</u> schedule C and Conditions 3(e) and 4(e) of this rule; and"</p> <p>AND AMEND Rule 3.11.5.2 (3) (a) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property <u>(unless the enterprise has a total area of less than or equal to 20 hectares);</u> and"</p> <p>AND AMEND Rule 3.11.5.2(4)(b)(ii) so that the reference to the nitrogen threshold (15 kgN/ha/yr) is deleted and replaced with a suitable land use intensity proxy</p> <p>AND AMEND Rule 3.11.5.2 (3)(b)(i) to read "...used for grazing livestock, the <u>annual</u> stocking rate of the land is no greater than the stocking rate of the land <u>at in the 12 months prior to 22 October 2016. Where the land was not used for livestock grazing in the 12 months prior to 22 October 2016 the land use shall have the same or lower diffuse discharges of</u></p>	<p>Support in part</p> <p>Oppose in part</p>	<p>privacy maintained, where appropriate).</p> <p>FFNZ supports putting the minimum standards into Schedule C but considers it ought to be amended as proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that paragraph 4b(i) and (ii) ought to be clarified and retained as an "either/or" i.e. if land is grazed paragraph (i) applies and paragraph (ii) applies as an "or" irrespective of whether the land is grazed.</p> <p>FFNZ supports clarity on fencing distances but provided that whether it is "horizontal" or otherwise it ought to be the most reasonable, practical and affordable option.</p> <p>FFNZ agrees that information ought to be supplied on request and not annually.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>nitrogen, phosphorus, sediment and microbial pathogens as the land use at 22 October 2016; or"</u> AND AMEND Rule 3.11.5.2(e) to clarify that the measurement for calculating the distance requirements for fencing are based on horizontal distances AND AMEND Rule 3.11.5.2 (5) to read: "For all properties greater than 4.1 hectares, from 31 March 2019, in addition to the requirements of Schedule A, the following information must be provided <u>on request</u> to the Waikato Regional Council by 1 <u>September each year:</u>"</p>		
Waipa District Council Submitter ID: 67704	PC1-3168	Rule 3.11.5.2	<p>AMEND Rule 3.11.5.2 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules. AND DELETE the provisions in Rule 3.11.5.2 and any other rules specifying a property or enterprise specific Nitrogen reference point be calculated and not exceeded.</p>	Support in part	<p>FFNZ agrees that subdivision, leasing and changes to farm enterprises needs to be provided for and that the approach ought to be reasonable and least cost. FFNZ proposes in its submission on Variation 1 that this is addressed through a condition in the controlled activity and other rules to require a new NRP to be calculated if property is subdivided.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p>
Waipapa Farms Ltd and Carlyle Holdings Ltd	PC1-4708	Rule 3.11.5.2	<p>DELETE Condition 1 under Rule 3.11.5.2 AND RETAIN Condition 2 but provide</p>	Support in part	<p>FFNZ supports registration with WRC and therefore considers condition 1 ought to remain.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73863			<p>additional clarity AND AMEND Condition 3 to apply to properties sized between 10 hectares and 40 hectares AND AMEND Condition 3(a) to provide clarification and improve the definition of enterprise. AND RETAIN the grandparenting rule allowing existing uses under Condition (3)(b)(i) and increase the stock unit limit. AND AMEND Condition 3(b)(i) to apply to properties sized between 10 hectares and 40 hectares AND AMEND to convert Condition 3(c) to an advisory note AND RETAIN Condition 3(e) AND AMEND Condition 4 to apply to properties sized between 10 hectares and 40 hectares AND DELETE Condition 5 AND AMEND Condition 5 to apply to properties sized between 10 hectares and 40 hectares AND DELETE Condition 5(c).</p>	Oppose in part	<p>FFNZ considers that condition 3 ought to apply to properties up to 20ha but would support extending this to properties up to 40ha if it was supported by a robust section 32 assessment.</p> <p>FFNZ does not support grand parenting but supports amendment of Rule 2 to provide for increases to a permitted baseline and/or 15kgN.</p> <p>FFNZ considers that condition 5 ought to only apply to properties under 20ha because for properties over 20ha this information would be provided through simplified FEPs (see FFNZ's submission on Variation 1). FFNZ also considers that this information ought to be provided "on request" not annually.</p>
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11371	Rule 3.11.5.2	RETAIN Rule 3.11.5.2 as notified or amended by similar wording to like effect.	Oppose in part	FFNZ considers that Rule 2 requires amendment as set out in its submission on Variation 1 e.g. flexibility to increase to 15kgN (or some other appropriate permitted baseline), simplified FEPs.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2140	Rule 3.11.5.2	RETAIN Rule 3.11.5.2 as proposed.	Oppose in part	FFNZ considers that Rule 2 requires amendment as set out in its submission on Variation 1 e.g. flexibility to increase to 15kgN (or some other appropriate permitted baseline), simplified FEPs.
Waitomo District Council	PC1-10328	Rule 3.11.5.2	AMEND Rule 3.11.5.2 to clarify how changes in property boundaries and	Support in part	FFNZ agrees that subdivision, leasing and changes to farm enterprises needs to be provided for and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73688			lease arrangements with properties and enterprises will affect compliance AND AMEND Rules 3.11.5.2 provisions specifying the Nitrogen Reference Point be calculated and not exceeded, and instead use the Nitrogen Reference Point as part of a Farm Environment Plan to inform mitigation measures.		that the approach ought to be reasonable and least cost. FFNZ proposes in its submission on Variation 1 that this is addressed through a condition in the controlled activity and other rules to require a new NRP to be calculated if property is subdivided. FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-11209	Rule 3.11.5.3	CONSIDER supporting programmes that support the retirement of vulnerable areas. Rule 3.11.5.3.	Support in part Oppose in part	FFNZ would support in principle non regulatory programmes (including funding) for retirement of steep and erosion prone land. However, FFNZ considers that this is not suitable as a regulatory approach or requirement.
Alcock, Carl and Jo Submitter ID: 73376	PC1-2183	Rule 3.11.5.3	Rule 3.11.5.3: AMEND by removing the Nitrogen Reference Point and use of the OVERSEER model. AND AMEND by adopting a sub-catchment approach to addressing contaminants relevant to each sub-catchment. AND AMEND by removing a blanket restriction of one nutrient that may not even be relevant for that sub-catchment. AND AMEND by using Farm Environment Plans to determine what is best for each farm and science to	Support in part Oppose in part	FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults. FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.

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			<p>determine what contaminants are an issue in each sub-catchment. AND DELETE the Nitrogen Reference Point and Overseer from all other areas in PPC1. AND AMEND stock exclusion requirements by using the national waterway accord recommendation that slope up to 15 degrees be fenced. AND AMEND by changing the exclusion requirements on a less than 15 degree slope so that they only apply to all permanently flowing waterbodies 1 metre or greater. AND AMEND by providing certainty that fencing is going to be enough and future retirement of land will not be required. AND AMEND by allowing stock to be mustered through waterbodies up to 3 times per week without a formed stock crossing structure. AND AMEND Farm Environment Plan by requiring them only in sub-catchments where science indicates improvements are required. AND AMEND by allowing flexibility in Farm Environment Plans so that they can be tailored to the individual property and focus on critical source management rather than blanket regulatory standards. AND establish an independent panel to allow contested points between</p>		<p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			staff and farmers to be settled without the expensive need to appeal to the Environment Court. AND any other consequential amendments arising from this submission point.		
Aston, Lucy Submitter ID: 73020	PC1-7107	Rule 3.11.5.3	DELETE the Nitrogen Reference Point requirements from PPC1 AND, if the Nitrogen Reference Point requirements are not deleted, AMEND PPC1 so that the OVERSEER Model is not solely relied on but is used as part of a range of measurement tools AND AMEND PPC1 so that where Overseer is used that the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters AND REMOVE the requirement for operations at or under 18 stock units, and sheep and beef farmers to have to manage to a Nitrogen Reference Point AND AMEND PPC1 to adopt a sub-catchment approach to addressing contaminants that are relevant to each farm and water body AND AMEND PPC1 so that where nitrogen discharges from a property have to be allocated then the allocation system is based on the natural capital of soils and the water	Support in part Oppose in part	<p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching.</p> <p>FFNZ supports properties obtaining an NRP provided it is only used as a reference point and not to grandparent nitrogen and provided flexibility is provided for using Overseer as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ supports tailored and proportionate FEPs with</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>quality outcomes that are to be achieved for each sub-catchment, not on the 2014/15 or 2015/16 land use or grandparenting approach AND AMEND PPC1 so that Farm Environment Plans are used to determine what would work best on each farm AND AMEND the slope requirements to be no greater than 15 degrees in accordance with the Clean Water Report AND AMEND the stock exclusion timelines by lengthening them and give certainty to those with land classified at risk of erosion that it will not be converted to forestry in a future plan change AND AMEND PPC1 to enable individual Farm Environment Plans to present farm specific mitigations against contaminants AND AMEND PPC1 to enable stock to enter water bodies if they are being actively managed and the water body is not crossed by stock more than 3 times per week. AND ADD new provisions that state that any waterway fencing be subsidised by the Waikato Regional Council and the regional communities, urban and rural, benefiting from improvements to the waterways. AND AMEND the Farm Environment</p>		<p>mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that there ought to be reasonable flexibility for low intensity farming activities to continue and flexibility to increase nitrogen. FFNZ proposes in its submission on Variation 1 that this ought to be on the basis of 15kgN for Rule 2 or some other reasonable "permitted baseline." FFNZ is concerned that 18 stock units or 20kN may be too high but would support if it was an appropriate measure of the permitted baseline.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Plan requirements so they are only required in sub-catchments where science indicates improvements are required.</p> <p>AND AMEND PPC1 so that for Farm Environment Plans an independent panel is available to ensure accountability and enable contested points to be settled without appeals to the Environment Court</p> <p>AND AMEND the stock exclusion provisions of PPC1 to the standards recommended in the Clean Water Report (February 2017), ie - only applies up to a slope of 15 degrees for deer and cattle; and only applies to waterbodies 1 metre or wider for cattle and deer on land between 3 and 15 degrees slope</p> <p>AND AMEND the stock exclusion provisions of PPC1 so fencing is required above 15 degree slope for farming operations greater than 18su/ha</p> <p>AND AMEND PPC1 so mitigations are set on a farm by farm basis, focused on management of clearly identified and measurable 'critical source management areas'</p> <p>AND AMEND PPC1 so the rules are focused on reducing impacts from intensive agriculture greater than 18su/ha rather than applying blanket rules to all extensive agriculture</p> <p>AND AMEND the Farm Environment</p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Plan requirements so they are produced by the landowner with Waikato Regional Council guidance and support.</p> <p>AND DELETE point 5(a) from Schedule 1.</p> <p>AND AMEND PPC1 so that there is flexibility in nitrogen leaching from hill country sheep and beef farming, and land uses which are low impact (at or below 20kgN/ha/yr for example or apply natural capital allocation)</p> <p>AND AMEND the timeframes to prepare Farm Environment Plans so they are set through consultation with the farmer taking into account the Waikato Regional Council subsidy available; the individual farmer's financial constraints; and the sensitivity of the waterbody to any impact.</p>		
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6195	Rule 3.11.5.3	<p>AMEND Rule 3.11.5.3 so that Farm Environment Plans across all catchments are provided to Waikato Regional Council at the same time.</p> <p>[Refer to relief elsewhere regarding certainty of meaning and implementation of PPC1 methods].</p>	Oppose in part	<p>FFNZ is concerned that WRC does not have the resources and the pool of certified farm environment planners is not likely to be sufficient to be able to prepare all FEPs at the same time. FFNZ is concerned about the implications for the content of FEPs and outcome. FFNZ considers that sufficient is known about the various sub-catchments to enable a prioritised approach that targets the hot spots first (but this is not necessarily on the basis of the three priority areas identified in PC1 and FFNZ refers further to the reasons set out in its submission on Variation 1).</p>
Auckland/Waikato Fish and Game and	PC1-10998	Rule 3.11.5.3	DELETE Rule 3.11.5.3.	Oppose	<p>In principle, FFNZ supports the CIS as an alternative option for those farmers who would</p>

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Eastern Region Fish and Game Submitter ID: 74085					rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. FFNZ considers that this option ought to be provided and ought to remain as a permitted activity.
Bailey, James Submitter ID: 73926	PC1-9022	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to replace the 'staged' approach with an 'Adaptive Management' approach to managing nitrogen and all contaminants AND AMEND PPC1 to recognise Land Use Suitability and Natural Capital as the basis of nitrogen management AND AMEND to enable transition toward the Vision and Strategy with Land Use Suitability as a starting point and using Adaptive Management as our understanding develops, reviewing and adapting through subsequent plan changes. AND DELETE the Rule 3.11.5.3 requirement to manage property level discharges to a Nitrogen Reference Point based on historic profiles AND AMEND PPC1 to apply Land Use Suitability and Natural Capital now by including allocation based on the Natural Capital of soils through a Land Use Capability approach AND AMEND to provide a flexibility cap for low leaching farm systems below a certain threshold	Support in part Oppose in part	In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available. FFNZ considers that LUS and natural capital are not sufficiently developed to provide a basis for nitrogen management. FFNZ does not support allocation of nitrogen or LUC as a basis for allocation. FFNZ considers there ought to be a transition to achieving the Vision & Strategy and that achieving the Vision & Strategy does not require the adoption of 80 year targets in this plan change. FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			(20kgN/ha/yr) that is deemed as a sustainable level for the transition period, with farmers with a Nitrogen Reference Point below this enabled to increase up to this point.		<p>premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ supports flexibility for low nitrogen discharges to increase but is not sure that 20kgN is the appropriate threshold. FFNZ would support it if it was supported by a robust section 32 assessment.</p>
Balle Bros Group Submitter ID: 67834	PC1-11424	Rule 3.11.5.3	<p>AMEND Rule 3.11.5.3(5) to read: 'A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council "as follows:</p> <p>a. By 1 July 2020 for properties or enterprises within Priority sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</p> <p>b. By 1 July 2023 for properties or enterprises within Priority 2 sub-catchments listed in Table 3.11-2;</p> <p>c. By 1 July 2026 for properties or enterprises within Priority 3 sub-catchments listed in Table 3.11-2;</p> <p>and"</p> <p>AND AMEND PPC1 to remove the Nitrogen Reference Point and adopt a tailored sub-catchment management approach that addresses all contaminants.</p>	Oppose in part	<p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p>

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Buckley, Peter Ross Submitter ID: 71423	PC1-1426	Rule 3.11.5.3	<p>RETAIN Rule 3.11.5.3 Farm Environment Plans, Certified Industry Schemes and Stock exclusion where practical</p> <p>AND DELETE the Nitrogen Reference Point from the rules</p> <p>AND AMEND Rule 3.11.5.3 to read: "3. Cattle, horses, deer and pigs ... Schedule C for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs."</p> <p>AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments</p> <p>AND AMEND to clarify stock exclusion requirements i.e. setback buffers, and where to measure setback from on undulating land</p> <p>AND AMEND to clarify how long a Farm Environment Plan will be viable for.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.</p> <p>FFNZ considers that this option ought to be provided and ought to remain as a permitted activity.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter</p>

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					<p>stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ considers that clarity around how long a FEP will be viable for and a procedure for amendment ought to be provided for in Schedule 1 (with consequential amendments to the rules, FFNZ refers to its submission on Variation 1).</p>
Cameron, Bruce Submitter ID: 60603	PC1-6394	Rule 3.11.5.3	<p>RETAIN Rule 3.11.5.3 AND AMEND Rule 3.11.5.3 to remove the Nitrogen Reference Point AND AMEND Rule 3.11.5.3 so that cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs AND AMEND PPC1 to address contaminants on a sub-catchment bases targeting the highest emitting sub-catchments AND AMEND to include clarification around stock exclusion requirements, ie setback buffers and where to measure setback from on undulating land AND AMEND to include clarification around how long a Farm Environment Plan will be viable for.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.</p> <p>FFNZ considers that this option ought to be provided and ought to remain as a permitted activity.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p>

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					<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ considers that clarity around how long a FEP will be viable for and a procedure for amendment ought to be provided for in Schedule 1 (with consequential amendments to the rules, FFNZ refers to its submission on Variation 1).</p>
Charion Investment Trust Submitter ID: 71344	PC1-7792	Rule 3.11.5.3	Rule 3.11.5.3: DELETE all the rules and schedules as appropriate to remove provisions for land use consent terms and conditions. AND RETAIN the use of rules for the control and reduction of nitrogen, phosphorous, sediment and microbial pathogens.	Oppose in part	<p>FFNZ considers that a reasonable consenting framework needs to be provided and considers this can be achieved through the consenting framework proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that the rules need to be hybrid land use and discharge rules due to the nature of diffuse discharges e.g. they cannot be directly measured.</p>
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10799	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to read: "...3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and <u>The Property complies with the region-wide Good Management Practices for pastoral land use; and...</u> "	Support in part Oppose in part	In principle, FFNZ agrees that farming activities ought to comply with industry agreed GMP. However, FFNZ is concerned that requiring this as a permitted activity standard may result in a "one size fits all" approach. It considers that a better approach is to require these activities to obtain a simplified FEP as set out in FFNZ's submission on Variation 1.

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			<p>AND AMEND PPC1 to ensure Waikato Regional Council retains the ability to review and revoke certification of the Industry Scheme where performance outcomes are not achieved.</p> <p>AND AMEND PPC1 to ensure Waikato Regional Council notifies all applications for Certified Industry Schemes and makes available copies of all audit and monitoring reports received from Certified Industry Schemes.</p>		
Cotman, Jim Submitter ID: 59884	PC1-4588	Rule 3.11.5.3	<p>WITHDRAW PPC1 AND REPLACE it with a new plan that endorses 'Best Practical Options' that are developed by landowners.</p> <p>AND AMEND to provide a new plan that supports the development and implementation of Catchment Management Plans that are led by landowners</p> <p>AND ENSURE this new plan supports identifying potential critical source contaminant pathways on a sub-catchment basis to provide quantifiable measures and factual information into Catchment Management Plans</p> <p>AND ENSURE the new plan encourages innovative new science that provide alternative means to managing water quality</p> <p>AND ENSURE the new plan recognises that well informed</p>	Support in part	<p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate. FFNZ agrees that robust science and information is required over the lifetime of this plan.</p> <p>FFNZ agrees that landowners ought to be involved in the preparation of FEPs and in the development of mitigations.</p> <p>FFNZ considers that a rules framework is needed but that this ought to provide a reasonable</p>

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			landowners as stewards of their land are the best and only people who can create action on the ground. AND ENSURE the new plan approach favours a 'shared values' approach where all parties work toward achieving sensible water quality targets. AND ENSURE that the primary focus of the new plan is a comprehensive programme to eliminate Koi Carp along with the native species predator, catfish.		consenting or permitted activity pathway as proposed in FFNZ's submission on Variation 1. FFNZ agrees that koi carp need to be addressed and that the focus ought to be on all sources of contaminants, not just diffuse discharges from farming activities.
Dudin, Alan and Sarah Submitter ID: 73852	PC1-4903	Rule 3.11.5.3	DELETE Rule 3.11.5.3 (2). AND AMEND so that nitrogen leaching limits are set based on the natural capital on the land. The allocation of leaching limits allocated to Land Use Capability units. AND AMEND so that the Waikato Regional Council revisits the Nitrogen leaching limit allocations on the Land Use Capability system as OVERSEER modelling is improved and subsequent versions are released. Certified Scheme/Activity Status: AND AMEND so that all farming industries be treated equally [permitted activity/require resource consent]. AND AMEND so that drystock farming be a Permitted Activity with an active Land and Environment Plan, provided by Environment	Support in part Oppose in part	FFNZ considers that discharges of contaminants from farming activities ought to be managed through tailored and proportionate FEPS. FFNZ considers that there is insufficient information or proxy or reliable basis to manage nitrogen on the basis of natural capital. FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit. FFNZ agrees that a consistent approach ought to be adopted. This is one reason it proposes that Council should not exercise control over the content of an FEP under the controlled activity (it does not

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Waikato or a Certified Farm Environment Planner. AND AMEND so that Farm Environment Plans to be monitored/ audited by certified Environment Waikato auditors on a regular basis. Stock Exclusion: AND AMEND Schedule C amended to state 'best practicable option' to exclude livestock AND AMEND to provide a clearer definition of a waterbody, such as 'wider than 1 metre, surface water deeper than 0.5 m for 80% of a year' to provide certainty AND AMEND to provide a clear definition of a 'stock proof natural barrier' AND AMEND to provide a clear definition of a 'livestock' in schedule C and 'cattle, horses, deer, and pigs' AND AMEND to provide greater flexibility to cattle grazing on slopes over 15 degrees, acknowledging that best practices such as rotation grazing at times when runoff of sediment would be low. (for example summer months, and low flows, or fast rotation such as 12 grazing days spread over a 12 month period) AND AMEND to be consistent with the Sustainable Dairy Accord, require a crossing if stock are crossing on a frequency basis, and where 'practicable'</p>		<p>have this control under the CIS permitted activity).</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP. FFNZ also considers that the LEP is likely to be able to amended or is sufficiently similar to the FEP process as amended in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

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			AND AMEND to introduce the stock exclusion at a staged rate, to provide certainty and supporting science at the 10 year review. That water bodies on land with a slope less than 15 degrees be fenced to exclude livestock in the first 10 years. With the review there is the expectation that there will be more supporting science and results from this, and then can consider whether to introduce the next stage.		
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10496	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to read: "...2. A Nitrogen Reference Point is produced <u>calculated</u> for the property or enterprise in conformance with Schedule B <u>and provided to Waikato Regional Council within the period 1 September 2018 to 31 March 2019;</u> and 3. <u>The three-year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council;</u> and" [Bullet point 3 becomes bullet 4.] "4.5. The Certified Industry Scheme meets the criteria <u>standards</u> set out in Schedule 2 and has been approved by the Chief Executive Officer of Waikato Regional Council; and 5.6. A Farm Environment Plan which has been prepared in accordance	Oppose	FFNZ considers that the NRP is more of an "estimate" than a "calculation" because it is based on the Overseer model (and various assumptions). FFNZ considers that the NRP ought to be calculated on a five year rolling average for reasons including that flexibility is needed e.g. during drought which may increase nitrogen if stock are not able to be sold (see FFNZ's submission on Variation 1). FFNZ considers that sufficient oversight of the CIS needs to be provided by Council (and that most likely means approval by WRC of each CIS). FFNZ considers that a prioritised approach ought to be adopted for reasons including that there are unlikely to be sufficient CFEPs to carry out all FEPs by 2020 (or any date as amended by Variation 1 or other submissions) and targeted and prioritised hot spot approach is more likely to result in the greatest water quality improvements for the lowest cost.

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			with Schedule 1 and has been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council as follows: a. By 1 July 2020.... for properties or enterprises within Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value; b. By 1 July 2023 for properties or enterprises within Priority 2 sub-catchments listed in Table 3.11-2; c. By 1 July 2026 for properties or enterprises within Priority 3 sub-catchments listed in Table 3.11-2; and AND RETAIN Conditions 6, 7 and 8 as notified (but renumbered as appropriate).		
Fonterra Shareholders Council Submitter ID: 72610	PC1-10641	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to ensure clarity and robustness.	Support	FFNZ agrees that Rule 3 ought to be amended to provide ensure it is clear and robust. FFNZ refers further to its submission on Variation 1 for how it considers that this ought to be achieved.
Glenshee Trust Submitter ID: 73028	PC1-1869	Rule 3.11.5.3	AMEND 3.11.5.3 if the use of the Nitrogen Reference Point is continued, consider using long term averaging of nitrogen losses. This provides more ability to cope with yearly changes that frequently occur within biological systems AND AMEND by giving further consideration to alternative tools such	Support in part Oppose in part	FFNZ considers that the NRP ought to be calculated on a five year rolling average for reasons including that flexibility is needed e.g. during drought which may increase nitrogen if stock are not able to be sold (see FFNZ's submission on Variation 1). In principle, FFNZ acknowledges that LUC could be used as a on farm decision support tool used as

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			<p>as the use of the natural capital approach AND AMEND by utilising tools such as Farm Menus developed by Waikato Regional Council as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model AND AMEND where Overseer is to be used as part of the creation of solutions then the calculations must be used as a guide only and the focus to be on the trends used AND AMEND Rule 3.11.5.3 stock exclusion provisions by considering in depth the implications of stock exclusion on steeper and more extensive hill country AND AMEND stock exclusion provisions by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority AND AMEND stock exclusion provisions by giving consideration to alternative solutions on steep land such as water reticulation installation AND AMEND stock exclusion provisions by giving consideration to matching land use capability rather than directly to slope which is a simplistic measure</p>		<p>one of a range of tools to help identify critical source areas and assess mitigations. However, FFNZ considers that it is not a proxy for nitrogen or a basis for allocation and considers that there is no suitable proxy for "natural capital." FFNZ considers that a more appropriate way to manage nitrogen (and other contaminants) is through tailored and proportionate FEPs with critical source areas identified and mitigations assessed using FFNZ's MPA framework (FFNZ refers further to its submission on Variation 1).</p> <p>FFNZ supports a "farm menu" type approach and considers that its MPA framework provides for a similar assessment.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

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			AMEND Rule 3.11.5.3 Farm Environment Plan provisions by providing an industry wide capability assessment to assess who will complete Farm Environment Plans AND AMEND Farm Environment Plan provisions to showing land owners and the industry how these are to be constructed and how the gains are quantified AND AMEND by providing clarity as to how the monitoring of Farm Environment Plans will be undertaken and who will pay for this before land owners commitment to this		<p>FFNZ agrees that there will likely be a shortage in CFEPs and considers that provision for that e.g. industry wide capability, ought to be provided for.</p> <p>FFNZ is concerned that by amending the FEP provisions to show landowners and industry how they can be constructed will result in them becoming too rigid and not sufficiently tailored. FFNZ considers that this could be addressed through guidance documents provided they were sufficiently flexible.</p>
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5773	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to a Best Practicable Option approach with permitted activity conditions above which a consent would be required.	Oppose in part	<p>FFNZ considers that the consenting regime ought to reflect the nature of the activity and ensure an effective effects based approach that considers all relevant factors.</p> <p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.</p>
Hill Country Farmers Group Submitter ID: 73321	PC1-7874	Rule 3.11.5.3	REMOVE the Nitrogen Reference Point AND REPLACE with a sub-catchment approach addressing all four contaminants equally and specifically for each sub-catchment. Specific requirements can then be translated into farm specific targets addressed within the Farm Environment Plan.	Support in part Oppose in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.

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			<p>AND AMEND Rule 3.11.5.3 to read: "1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and 3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u>; and 4. The Certified Industry Scheme meets the criteria set out in Schedule 2 and has been approved by the Chief Executive Officer of Waikato Regional Council; and 5. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner <u>or approved landowner</u>, is provided to the Waikato Regional Council as follows: a. By 1 July 2020 for properties or enterprises within Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value; b. By 1 July 2023 for properties or</p>		<p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.</p> <p>Having said this, FFNZ agrees that farmers need to be involved in the preparation of FEPs.</p>

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			enterprises within Priority 2 sub-catchments listed in Table 3.11-2; c. By 1 July 2026 for properties or enterprises within Priority 3 sub-catchments listed in Table 3.11-2; and 6. The use of land shall be undertaken in accordance with the actions and timeframes specified in the Farm Environment Plan; and..."		
Loader, A J Submitter ID: 74084	PC1-7440	Rule 3.11.5.3	AMEND Rule 3.11.5.3 by removing the use of the OVERSEER Model as a regulatory tool. AND AMEND by exploring other methods to establish Nitrogen Reference Points if they are required in a given sub-catchment. AND AMEND so that any required reduction in emissions be made on the basis of the total percentage emitted from farming (i.e. 61% nitrogen and 45% phosphorus) as a part of the total reduction required for all waterways. AND AMEND to identify other off-farm solutions to reduce nitrogen and phosphorus loadings on the rivers that are reasonable and equitable.	Support in part Oppose in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance. FFNZ is concerned that the proposal to make reductions on a total basis in proportion to total discharges from the farm will be used to justify or form the basis for allocation. FFNZ does not support allocation and considers that the proposed approach would likely result in significant costs for no net benefit. FFNZ supports the exploration of other options such as off farm solutions, edge of field mitigations, off setting and whole catchment actions.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9338	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan provided approved under Condition 5	Support in part Oppose in	FFNZ does not support the requirement that the FEP is provided to WRC for approval. FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that

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			<p>may..."</p> <p>AND ADD "<u>Note: For the purpose of Rule 3.11.5.3, any property or enterprise that is deemed by the Council to be non-compliant shall be considered subject to Rule 3.11.5.6.</u>"</p> <p>OR</p> <p>AMEND Rule 3.11.5.3 to be a controlled activity with the matters of control being set out in amended Schedule 2.</p> <p>AND AMEND to ensure the Waikato and Waipā River Iwi are notified of all applications to Waikato Regional Council for Certified Industry Schemes.</p>	part	<p>this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.</p> <p>FFNZ considers that if a property does not meet the permitted activity standard it ought to have the option of the controlled activity before defaulting to the RD activity rule.</p> <p>FFNZ considers that there should be no need to notify Waikato and Waipa River Iwi if the CIS is prepared in accordance with PC1.</p>
McLaughlin, Kate Submitter ID: 72498	PC1-6006	Rule 3.11.5.3	<p>DELETE from Rule 3.11.5.3 the provision relating to the adoption of the Nitrogen Reference Point</p> <p>AND REPLACE with provisions to allow nitrogen leaching to be monitored through stock units outlined in Farm Environment Plans</p> <p>AND REMOVE the use of default values in the OVERSEER Model and incorporate actual weights and values which are specific to each farm</p> <p>AND AMEND the stock exclusion provisions so they apply on a farm by farm basis based on sub-catchment specific scientific information, tailored to those sub-catchments which have been identified as having a water quality issue</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ opposes the proposal to adopt stock units in an FEP for reasons including that it is an input control approach, does not provide for sufficient tailoring or flexibility and is likely to impose</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND REMOVE the 25 degree slope provisions AND REPLACE it with farming operations having over 18 stock units per hectare</p> <p>AND AMEND to use Farm Environment Plans to focus stock exclusion from waterways on areas which have a scientific proof of water quality degradation</p> <p>AND AMEND to allow cattle to be mustered through waterways without an approved stock crossing when crossing less than three times per week</p> <p>AND AMEND so that Farm Environment Plans should be implemented in sub-catchments that have scientific evidence of the need for improvement</p> <p>AND AMEND Farm Environment Plans must be flexible to accommodate market and environmental changes</p> <p>AND REMOVE the time constraints for preparation of Farm Environment Plans and allow farmers to set a plan based on their financial restrictions and apply it to the scientific, sub-catchment specific data.</p>		<p>significant cost for no net benefit.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ agrees that FEPs need to be flexible to respond to changes in circumstances e.g. climatic events, animal welfare etc and refers to its submission on Variation 1 including proposed policies 2 and 2A and amendments to Schedule 1.</p> <p>FFNZ considers that the timeframes ought to be amended particularly in light of the two year delay following notification of PC1.</p>
Mercury NZ Limited Submitter ID: 73182	PC1-9599	Rule 3.11.5.3	<p>RETAIN Rule 3.11.5.3</p> <p>AND AMEND Rule 3.11.5.3 to read: "3.11.5.3 Permitted Activity Rule - Farming activities with a Farm Environment Plan under a Certified <u>Industry Sector</u> Scheme..."</p>	Support in part	<p>FFNZ considers that the name of the CIS ought to reflect what it is but is concerned that "sector" is not the right term.</p> <p>FFNZ also considers that Rule 3 requires further amendments as set out in its submission on</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Rule 3.11.5.3 - Permitted Activity Rule - Farming activities with a Farm Environment Plan under a Certified <u>Industry Sector</u> Scheme</p> <p>Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) where the land use is registered to a Certified <u>Industry Sector</u> Scheme.... is a permitted activity subject to the following conditions:...</p> <p>4. The Certified <u>Industry Sector</u> Scheme meets the criteria set out in Schedule 2 and has been approved by the Chief Executive Officer of Waikato Regional Council; and..."</p>		Variation 1.
Miraka Limited Submitter ID: 73492	PC1-8891	Rule 3.11.5.3	<p>AMEND Rule 3.11.5.3(5)(a)-(c) with a single 1 July 2020 date for all Farm Environment Plans to be prepared and provided</p> <p>AND REMOVE from Rule 3.11.5.3(5)(a) reference to the 75th percentile nitrogen leaching value.</p>	Oppose	<p>FFNZ considers that a prioritised approach ought to be adopted for reasons including that there are unlikely to be sufficient CFEPs to carry out all FEPs by 2020 (or any date as amended by Variation 1 or other submissions) and targeted and prioritised hot spot approach is more likely to result in the greatest water quality improvements for the lowest cost.</p> <p>In principle, FFNZ supports an approach that requires the 75th percentile to reduce but FFNZ considers that further consideration needs to be given to the appropriate spatial scale (e.g. the Upper Waikato FMU is too large and varied) and to how the NRP is calculated. FFNZ refers further to its submission on Variation 1.</p>
Moerangi Trust Submitter ID: 73111	PC1-4276	Rule 3.11.5.3	<p>AMEND Rule 3.11.5.3 to provide for a change to the definition of a waterway to that of the National</p>	Support in part	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Water Accord AND AMEND to provide for a change to the slope requirements to 15 degrees as per the National Water Accord AND AMEND to ensure Farm Environment Plans present mitigations against contaminants, relevant to each farm, rather than a blanket approach AND CONSIDER subsidising fencing waterways and contaminant mitigation AND AMEND to provide for science to determine the necessity of fencing of water bodies, based on their current level of contamination, stocking rate and the proven impact of fencing of water bodies. AND REMOVE the Nitrogen Reference Point from PPC1 AND REMOVE the use of OVERSEER from PPC1 AND ADD a sub-catchment approach which focuses on the contaminants of each particular sub-catchment and is based on science AND AMEND to use Farm Environment Plans to determine the best scenario for each farm and allow them to address the potential or present contaminants AND AMEND the rules so they are effects and science based.</p>		<p>standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ agrees that rules ought to be effects based and science based, as opposed to ownership based or based on unrealistic assumptions for example.</p>
New Zealand	PC1-9959	Rule 3.11.5.3	REPLACE Rule 3.11.5.3 with	Support in	FFNZ supports a targeted hot spot approach that

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Forest Owners Association Inc Submitter ID: 73524			appropriate rules to address those activities that are contributing most to water quality degradation. AND any consequential amendments.	part Oppose in part	focuses on contaminants and sub-catchments of greatest risk and on bang for buck mitigations. However, FFNZ considers that Rule 3 ought to be retained as amended in its submission on Variation 1.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4644	Rule 3.11.5.3	RETAIN Rule 3.11.5.3.	Support in part	FFNZ supports the overall intention of Rule 3. However, it considers amendments are required as set out in its submission on Variation 1.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11860	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan provided <u>approved</u> under Condition 5 may..." AND ADD " <u>Note: For the purpose of Rule 3.11.5.3, any property or enterprise that is deemed by the Council to be non-compliant shall be considered subject to Rule 3.11.5.6.</u> " OR AMEND Rule 3.11.5.3 to be a controlled activity with the matters of control being set out in amended Schedule 2. AND AMEND to ensure the Waikato and Waipā River Iwi are notified of all applications to Waikato Regional Council for Certified Industry Schemes.	Support in part Oppose in part	FFNZ does not support the requirement that the FEP is provided to WRC for approval. FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome. FFNZ considers that if a property does not meet the permitted activity standard it ought to have the option of the controlled activity before defaulting to the RD activity rule. FFNZ considers that Rule 3 ought to be a permitted activity. FFNZ considers that there should be no need to notify Waikato and Waipa River Iwi if the CIS is prepared in accordance with PC1.
Ngati Haua Tribal Trust Submitter ID:	PC1-1970	Rule 3.11.5.3	AMEND to provide for the long term averaging of nitrogen losses. Rule 3.11.5.3	Support in part	FFNZ supports the calculation of the NRP on the basis of a five year rolling average and with a longer benchmarking period and with flexibility for the use

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
73025			<p>AND AMEND to include alternative tools such as the use of the natural capital approach.</p> <p>AND AMEND by utilising tools such as menus as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by Overseer.</p> <p>AND AMEND where OVERSEER is to be used as part of the creation of solutions, calculations must be used as a guide only and the focus to be on the trends that are used.</p> <p>Stock Exclusion AMEND to address the implications of stock exclusion on steeper and more extensive hill country.</p> <p>AND AMEND by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority.</p> <p>AND AMEND to consider alternative solutions on steep land such as water reticulation installation.</p> <p>AND AMEND to match land use capability rather than directly to slope.</p> <p>Farm Environment Plan Undertake an industry wide capability assessment to assess who will complete the plans.</p> <p>AMEND to show land owners and the</p>	Oppose in part	<p>of Overseer as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that there is no robust "natural capital" approach currently available and is concerned that this will result in an allocation approach based on LUC (which FFNZ opposes).</p> <p>FFNZ agrees that alternative options or models to Overseer ought to be provided for.</p> <p>FFNZ considers the stock exclusion minimum standards ought to be amended to provide for hill country and extensive farming e.g. assess the requirements on 18 stock units (or a similar approach that looks at intensity) as set out in FFNZ's submission on Variation1.</p> <p>FFNZ does not support matching land use to capability because there is no measure of capability that would take into account all natural capital or no measure that is a reasonable proxy for contaminant discharges.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>industry how these are to be constructed and how the gains are quantified.</p> <p>AND AMEND to provide clarity as to how the monitoring of these plans will be undertaken and who will pay for this.</p>		
<p>Oji Fibre Solutions (NZ) Limited Submitter ID: 73725</p>	<p>PC1-8084</p>	<p>Rule 3.11.5.3</p>	<p>AMEND Rule 3.11.5.3 to read: "...Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding or commercial vegetable production) where the land use is registered to a Certified Industry Scheme, and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a permitted activity provided that subject to the following conditions: 1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B ; and 3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and 4. The Certified Industry Scheme has a resource consent granted under Rule 3.11.5.8 [new RMA rule</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports extending the CIS to commercial vegetable production.</p> <p>FFNZ does not support a requirement for the CIS to obtain resource consent. FFNZ also opposes the BPO approach proposed by this submitter which is based on input controls.</p>

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			<p>proposed in the submission] meets the criteria set out in Schedule 2 and has been approved by the Chief Executive Officer of Waikato Regional Council; and</p> <p>5. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council as follows:</p> <p>a. By 1 July 2020 for properties or enterprises within Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</p> <p>b. By 1 July 2013 for properties or enterprises within Priority 2 sub-catchments listed in 3.11-2; c. By 1 July 2026 for properties or enterprises within Priority 3 sub-catchments listed in Table 3.11-2; and</p> <p>6. The use of land shall be undertaken in accordance with the actions and timeframes specified in the Farm Environment Plan; and</p> <p>7. The Farm Environment Plan provided under Condition 5 may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be</p>		

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			undertaken in accordance with the amended plan; and 8. A copy of the Farm Environment Plan amended in accordance with Condition (7) shall be provided to the Waikato Regional Council within 30 working days."		
Pamu Farms of New Zealand Submitter ID: 74000	PC1-6007	Rule 3.11.5.3	RETAIN Rule 3.11.5.3 (1), (2) and (3).	Support in part	FFNZ supports the overall intention of Rule 3. However, it considers amendments are required as set out in its submission on Variation 1.
Pinnell, Graham Submitter ID: 74007	PC1-4372	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to recognise the value of experiential learning and adaptive management AND ENSURE focus is on monitoring, including trend monitoring of E.coli, phosphorus, ammonia and clarity during summer low flow AND AMEND to place an obligation to undertake staged riparian fencing prior to Farm Environment Plan deadlines AND ALLOW a reasonable time between submitting a Farm Environment Plan and completion of stock exclusion works AND DELETE Nitrogen Reference Points and cap nitrogen discharges AND REPLACE with the requirement to adopt Best Management Practice for nitrogen leaching AND AMEND to require farmers to submit an annual return under 3.11.5.2(5) to enable Council to monitor trends in land use intensity.	Support in part Oppose in part	In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available. FFNZ agrees that monitoring ought to focus on summer low flow. FFNZ does not support making the minimum standards more stringent e.g. a requirement to undertake staged riparian fencing prior to an FEP. FFNZ agrees that a reasonable period of time ought to be provided for implementation of mitigations including stock exclusion works. FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP but only if it is referred to in non regulatory methods and not part of the rules. FFNZ considers that GMP ought to be considered as part of the MPA assessment of mitigations when preparing a FEP as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that the requirement to submit an "annual return" is too stringent and rigid. FFNZ's concerns also include confidentiality and privacy concerns and concerns that the information will be used to allocate contaminants.</p>
Primary Land Users Group Submitter ID: 71427	PC1-11174	Rule 3.11.5.3	<p>AMEND Rule 3.11.5.3 to read: "2. A Nitrogen Reference Point i produce for the property or enterprise in conformance with Schedule B; and 3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs; and...</u></p> <p>...</p> <p>5. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council as follows:</p> <p>a. By 1 July 2020 for properties or</p>	Support in part	<p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			enterprises within Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 15th percentile nitrogen leaching value; b. By 1 July 2023 for properties or enterprises within Priority 2 sub-catchments listed in Table 3.11-2; c. By 1 July 2026 for properties or enterprises within Priority 3 sub-catchments listed in table 3.11-2; and" AND REMOVE the Nitrogen Reference Point from PPC1 AND AMEND to adopt a sub-catchment approach addressing all four contaminants in proportion to their significance, and specific to each sub-catchment.		FNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10596	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan provided <u>approved</u> under Condition 5 may..." AND ADD " <u>Note: For the purpose of Rule 3.11.5.3, any property or enterprise that is deemed by the Council to be non-compliant shall be considered subject to Rule 3.11.5.6.</u> " OR AMEND Rule 3.11.5.3 to be a controlled activity with the matters of control being set out in amended Schedule 2.	Support in part Oppose in part	FFNZ does not support the requirement that the FEP is provided to WRC for approval. FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome. FFNZ considers that if a property does not meet the permitted activity standard it ought to have the option of the controlled activity before defaulting to the RD activity rule.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to ensure the Waikato and Waipā River Iwi are notified of all applications to Waikato Regional Council for Certified Industry Schemes.		FFNZ considers that Rule 3 ought to be a permitted activity not controlled. FFNZ considers that there should be no need to notify Waikato and Waipa River Iwi if the CIS is prepared in accordance with PC1.
Ravensdown Limited Submitter ID: 74058	PC1-10144	Rule 3.11.5.3	RETAIN the permitted activity status and intent of Rule 3.11.5.3 subject to adopting amendments to Method 3.11.4.2. AND ADOPT the definitions sought in this submission relating to certification programmes.	Support in part	FFNZ supports the overall intention of Rule 3. However, it considers amendments are required as set out in its submission on Variation 1.
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5709	Rule 3.11.5.3	REMOVE the use of OVERSEER or any other measuring tool in PPC1 until it is accurate both relatively and absolutely. Rule 3.11.5.3 AND DELETE the use of benchmarking or allocation. AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives. AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves. AND research a series of mitigations with strong data to support their efficacy and help introduce them. These will in combination with pollution levies have the greatest and fastest effect on water pollution.	Oppose in part Support in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance. FFNZ does not support any form of allocation, including grand parenting, for reasons including that there is no need to allocate and any consideration of allocation is premature. FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that care is required with any prosecution approach because there is significant uncertainty (including in measuring property discharges and the assumptions underlying targets). FFNZ considers that significant gains are likely to be made through farmers obtaining FEPs and that further gains can be made through education and industry support.</p>
Taupo District Council Submitter ID: 74207	PC1-8168	Rule 3.11.5.3	RETAIN the use of a Certified Industry Scheme as provided for in Rule 3.11.5.3.	Support in part	FFNZ supports the overall intention of Rule 3. However, it considers amendments are required as set out in its submission on Variation 1.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9357	Rule 3.11.5.3	<p>DELETE from Rule 3.11.5.3 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments AND develop a measurement system that targets E.coli and phosphorous as a precursor for the whole Farm Environment Plan AND develop a stock exclusion measure that takes into account the length of waterway excluded, and/or the amount of fencing, and/or the area of planting, and /or the edge of field improvements and stock intensity AND AMEND so that once the stock exclusion and edge of field improvements are achieved an Overseer based program could be</p>	Oppose	<p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ does not support allocation for reasons including that there is no reliable or equitable basis and contaminants can be appropriately managed without the need to allocate. FFNZ also considers that such an approach will impose significant cost and will not provide sufficient flexibility or tailoring of mitigations.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			considered AND MAKE any other consequential amendments.		affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11810	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan provided approved under Condition 5 may..." AND ADD " <u>Note: For the purpose of Rule 3.11.5.3, any property or enterprise that is deemed by the Council to be non-compliant shall be considered subject to Rule 3.11.5.6.</u> " OR AMEND Rule 3.11.5.3 to be a controlled activity with the matters of control being set out in amended Schedule 2. AND AMEND to ensure the Waikato and Waipā River Iwi are notified of all applications to Waikato Regional Council for Certified Industry Schemes.	Support in part Oppose in part	FFNZ does not support the requirement that the FEP is provided to WRC for approval. FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome. FFNZ considers that if a property does not meet the permitted activity standard it ought to have the option of the controlled activity before defaulting to the RD activity rule. FFNZ considers that Rule 3 ought to be permitted and not a controlled activity rule. FFNZ considers that there should be no need to notify Waikato and Waipa River Iwi if the CIS is prepared in accordance with PC1.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID:	PC1-8427	Rule 3.11.5.3	DELETE Rule 3.11.5.3	Oppose	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.

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74122					FFNZ considers that this option ought to be provided and ought to remain as a permitted activity.
Timberlands Limited Submitter ID: 73036	PC1-3433	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to read as: "... 3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and <u>The property complies with the region-wide good management practices for pastoral land use; and.</u> "	Support in part Oppose in part	In principle, FFNZ agrees that farming activities ought to comply with industry agreed GMP. However, FFNZ is concerned that requiring this as a permitted activity standard may result in a "one size fits all" approach. It considers that a better approach is to require these activities to obtain a simplified FEP as set out in FFNZ's submission on Variation 1.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10487	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan provided <u>approved</u> under Condition 5 may..." AND ADD " <u>Note: For the purpose of Rule 3.11.5.3, any property or enterprise that is deemed by the Council to be non-compliant shall be considered subject to Rule 3.11.5.6.</u> " OR AMEND Rule 3.11.5.3 to be a controlled activity with the matters of control being set out in amended Schedule 2. AND AMEND to ensure the Waikato and Waipā River Iwi are notified of all applications to Waikato Regional Council for Certified Industry Schemes.	Support in part Oppose in part	FFNZ does not support the requirement that the FEP is provided to WRC for approval. FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome. FFNZ considers that if a property does not meet the permitted activity standard it ought to have the option of the controlled activity before defaulting to the RD activity rule. FFNZ considers that Rule 3 ought to be permitted and not a controlled activity rule. FFNZ considers that there should be no need to notify Waikato and Waipa River Iwi if the CIS is prepared in accordance with PC1.
Waikato and Waipa	PC1-9654	Rule 3.11.5.3	AMEND Rule 3.11.5.3(3) to read:	Oppose	FFNZ considers that stock exclusion and set backs

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Branches of the New Zealand Deer Farmers Association Submitter ID: 74008			"Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C"		ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3523	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan provided <u>approved</u> under Condition 5 may..." AND ADD " <u>Note: For the purpose of Rule 3.11.5.3, any property or enterprise that is deemed by the Council to be non-compliant shall be considered subject to Rule 3.11.5.6.</u> " OR AMEND Rule 3.11.5.3 to be a controlled activity with the matters of control being set out in amended Schedule 2. AND AMEND to ensure the Waikato and Waipā River Iwi are notified of all applications to Waikato Regional Council for Certified Industry Schemes.	Support in part Oppose in part	FFNZ does not support the requirement that the FEP is provided to WRC for approval. FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome. FFNZ considers that if a property does not meet the permitted activity standard it ought to have the option of the controlled activity before defaulting to the RD activity rule. FFNZ considers that Rule 3 ought to be permitted and not a controlled activity rule. FFNZ considers that there should be no need to notify Waikato and Waipa River Iwi if the CIS is prepared in accordance with PC1.
Waikato Dairy Leaders Group Submitter ID:	PC1-11026	Rule 3.11.5.3	RETAIN the Permitted Activity status of Rule 3.11.5.3 AND RETAIN the intent to require a	Support in part	FFNZ supports the overall intention of Rule 3. However, it considers amendments are required as set out in its submission on Variation 1.

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74049			Farm Environment Plan that is tailored to each individual farm, from farmers who have signed up to a Certified Industry Scheme AND AMEND to ensure Rule 3.11.5.3 has the same rigour of requirements as Rule 3.11.5.4, including the development, monitoring and enforcement of the Farm Environment Plan.		FFNZ agrees that the rigor, robustness and requirements ought to be the same (or consistent or similar) as the controlled activity rule.
Waikato Regional Council Submitter ID: 72890	PC1-3417	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1. AND AMEND Rule 3.11.5.3(3) to read: " <u>The use of land for farming activities</u> cattle, horses, deer and pigs are excluded from water bodies in conformance with <u>shall comply</u> with Schedule C;" AND AMEND Rule 3.11.5.3 to include a specific requirement that land users must farm such that when their farming activities are modelled in OVERSEER®, the OVERSEER® nitrogen leaching loss does not exceed the Nitrogen Reference Point for the property.	Support in part	FFNZ agrees that the dates ought to be extended and considers the submitter's proposal for 12 months after decisions has merit (although FFNZ considers some dates will need to be longer). FFNZ considers that Schedule C ought to be amended as proposed in its submission on Variation 1, including to ensure it contains all reasonable minimum standards. In principle, FFNZ supports a requirement to maintain the NRP but considers that a reasonable pathway needs to be provided for increases in nitrogen and that matters regarding overseer need to be addressed e.g. version change, alternative models, mitigations outside Overseer, changes in input standards/assumptions, five year rolling average (see FFNZ's submission on Variation 1).
Waipa District Council Submitter ID: 67704	PC1-3169	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules. AND DELETE the provisions in Rule	Support in part	FFNZ agrees that subdivision, leasing and changes to farm enterprises needs to be provided for and that the approach ought to be reasonable and least cost. FFNZ proposes in its submission on Variation 1 that this is addressed through a condition in the controlled activity and other rules to require a new

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			3.11.5.3 and any other rules specifying a property or enterprise specific Nitrogen Reference Point be calculated and not exceeded.		<p>NRP to be calculated if property is subdivided.</p> <p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p>
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11372	Rule 3.11.5.3	DELETE Rule 3.11.5.3 or prepare a variation or plan change to incorporate any Certified Industry Scheme in to the Waikato Regional Plan by reference AND MAKE consequential amendments to PPC1 to insert the words " <u>any relevant</u> " before any reference to 'Certified Industry Scheme/s'.	Oppose	<p>In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.</p> <p>FFNZ considers that this option ought to be provided and ought to remain as a permitted activity. FFNZ does not agree that CIS have to be incorporated into a plan change by reference to the name of the specific scheme.</p>
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2141	Rule 3.11.5.3	AMEND the implementation date for Farm Environment Plans for all sub-catchments to 1st July 2020 and amend dates accordingly in Rule 3.11.5.3(5)(b) and (5)(c). AND DELETE reference to the 75th percentile nitrogen leaching value.	Oppose	<p>FFNZ considers that a prioritised approach ought to be adopted for reasons including that there are unlikely to be sufficient CFEPs to carry out all FEPs by 2020 (or any date as amended by Variation 1 or other submissions) and targeted and prioritised hot spot approach is more likely to result in the greatest water quality improvements for the lowest cost.</p> <p>In principle, FFNZ supports an approach that requires the 75th percentile to reduce but FFNZ considers that further consideration needs to be given to the appropriate spatial scale (e.g. the</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					Upper Waikato FMU is too large and varied) and to how the NRP is calculated. FFNZ refers further to its submission on Variation 1.
Waitomo District Council Submitter ID: 73688	PC1-10330	Rule 3.11.5.3	AMEND Rule 3.11.5.3 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance. AND AMEND in Rule 3.11.5.3 the provisions that specifying the Nitrogen Reference Point be calculated and not exceeded, and instead use the Nitrogen Reference Point as part of a Farm Environment Plan to inform mitigation measures.	Support in part	FFNZ agrees that subdivision, leasing and changes to farm enterprises needs to be provided for and that the approach ought to be reasonable and least cost. FFNZ proposes in its submission on Variation 1 that this is addressed through a condition in the controlled activity and other rules to require a new NRP to be calculated if property is subdivided. FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-11208	Rule 3.11.5.4	AMEND Rule 3.11.5.4 Matters of Control ii. and iii. to provide for exceptions to the maintaining or reductions of contaminants and exceedances of the Nitrogen Reference Point in the case of low level discharges not required to be reduced. AND RETAIN the OVERSEER Model as the preferred modelling tool for PPC1. AND AMEND Rule 3.11.5.4.1 to provide for the 50th percentile nitrogen leaching value to be prioritised for Farm Environment	Support in part Oppose in part	FFNZ does not support a requirement that low discharge activities maintain low levels and considers that they ought to be able to increase as a permitted activity (see FFNZ's submission on Variation 1). FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.

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			Plans and in Matters of Control in consideration of resource consents. AND ANY consequential amendments. AND CONSIDER supporting programmes that support the retirement of vulnerable areas.		FFNZ does not support prioritising activities in the 50 th percentile nitrogen leaching value for reasons including that this will impose significant cost for no net benefit. FFNZ would support in principle non regulatory programmes (including funding) for retirement of steep and erosion prone land. However, FFNZ considers that this is not suitable as a regulatory approach or requirement.
Alcock, Carl and Jo Submitter ID: 73376	PC1-2184	Rule 3.11.5.4	AMEND Rule 3.11.5.4 by removing the Nitrogen Reference Point and use of OVERSEER. AMEND by adopting a sub-catchment approach to addressing contaminants relevant to each sub-catchment. AMEND by removing a blanket restriction of one nutrient that may not even be relevant for that sub-catchment. AMEND by using Farm Environment Plans to determine what is best for each farm and science to determine what contaminants are an issue in each sub-catchment. DELETE the Nitrogen Reference Point and Overseer from all other areas in PPC1. AND any other consequential amendments. Stock Exclusion AMEND by using the national waterway accord recommendation that slope up to 15 degrees be	Support in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance. FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate. FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>fenced. AMEND by changing the exclusion requirements on a less than 15 degree slope so that they only apply to all permanently flowing waterbodies 1 metre or greater. AMEND by providing certainty that fencing is going to be enough and future retirement of land will not be required. AMEND by allowing stock to be mustered through waterbodies up to 3 times per week without a formed stock crossing structure. AMEND to clarify the definition of 25 degree slope standards which are required to be fenced up to. AND any other consequential amendments arising from this submission point. Farm Environment Plans AMEND by requiring Farm Environment Plans only in sub-catchments where science indicates improvements are required. AMEND by allowing flexibility in Farm Environment Plans so that they can be tailored to the individual property and focus on critical source management rather than blanket regulatory standards. Establish an independent panel to allow contested points between staff and farmers to be settled without the expensive need to appeal to the</p>		<p>threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.</p>

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			Environment Court. AND any other consequential amendments arising from this submission point.		
Aston, Lucy Submitter ID: 73020	PC1-7065	Rule 3.11.5.4	DELETE the Nitrogen Reference Point requirements from PPC1 AND, if the Nitrogen Reference Point requirements are not deleted, AMEND PPC1 so that the OVERSEER Model is not solely relied on but is used as part of a range of measurement tools AND AMEND PPC1 so that where Overseer is used that the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters AND REMOVE the requirement for operations at or under 18 stock units, and sheep and beef farmers to have to manage to a Nitrogen Reference Point AND AMEND PPC1 to adopt a sub-catchment approach to addressing contaminants that are relevant to each farm and water body AND AMEND PPC1 so that where nitrogen discharges from a property have to be allocated then the allocation system is based on the natural capital of soils and the water quality outcomes that are to be achieved for each sub-catchment, not	Support in part Oppose in part	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p> <p>FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>on the 2014/15 or 2015/16 land use or grandparenting approach. AND AMEND PPC1 so that Farm Environment Plans are used to determine what would work best on each farm AND AMEND the slope requirements to be no greater than 15 degrees in accordance with the Clean Water Report AND AMEND the stock exclusion timelines by lengthening them and give certainty to those with land classified at risk of erosion that it will not be converted to forestry in a future plan change AND AMEND PPC1 to enable individual Farm Environment Plans to present farm specific mitigations against contaminants AND AMEND PPC1 to enable stock to enter waterbodies if they are being actively managed and the waterbody is not crossed by stock more than 3 times per week. AND ADD new provisions that state that any waterway fencing be subsidised by the Waikato Regional Council and the regional communities, urban and rural, benefiting from improvements to the waterways. AND AMEND the Farm Environment Plan requirements so they are only required in sub-catchments where</p>		<p>reasons including that it is not a proxy for nitrogen leaching. FFNZ also considers that there is no reliable alternative measure of natural capital. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>science indicates improvements are required. AND AMEND PPC1 so that for Farm Environment Plans an independent panel is available to ensure accountability and enable contested points to be settled without appeals to the Environment Court AND AMEND the stock exclusion provisions of PPC1 to the standards recommended in the Clean Water Report (February 2017), ie - only applies up to a slope of 15 degrees for deer and cattle; and only applies to waterbodies 1 metre or wider for cattle and deer on land between 3 and 15 degrees slope AND AMEND the stock exclusion provisions of PPC1 so fencing is required above 15 degree slope for farming operations greater than 18su/ha AND AMEND PPC1 so mitigations are set on a farm by farm basis, focused on management of clearly identified and measurable 'critical source management areas' AND AMEND PPC1 so the rules are focused on reducing impacts from intensive agriculture greater than 18su/ha rather than applying blanket rules to all extensive agriculture AND AMEND the Farm Environment Plan requirements so they are produced by the landowner with</p>		<p>prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP.</p> <p>FFNZ considers that the timeframes need to be amended to recognise the 2 year delay since notification of PC1 and ought to be reasonable.</p>

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			Waikato Regional Council guidance and support. AND DELETE point 5(a) from Schedule 1. AND AMEND PPC1 so that there is flexibility in nitrogen leaching from hill country sheep and beef farming, and land uses which are low impact (at or below 20kgN/ha/yr for example or apply natural capital allocation) AND AMEND the timeframes to prepare Farm Environment Plans so they are set through consultation with the farmer taking into account the Waikato Regional Council subsidy available; the individual farmer's financial constraints; and the sensitivity of the waterbody to any impact.		
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6197	Rule 3.11.5.4	AMEND Rule 3.11.5.4 so that Farm Environment Plans across all catchments are provided to Waikato Regional Council at the same time. [Refer to relief elsewhere regarding certainty of meaning and implementation of PPC1 methods].	Oppose in part	FFNZ is concerned that WRC does not have the resources and the pool of certified farm environment planners is not likely to be sufficient to be able to prepare all FEPs at the same time. FFNZ is concerned about the implications for the content of FEPs and outcome. FFNZ considers that sufficient is known about the various sub-catchments to enable a prioritised approach that targets the hot spots first (but this is not necessarily on the basis of the three priority areas identified in PC1 and FFNZ refers further to the reasons set out in its submission on Variation 1).
Auckland/Waikato Fish and Game and Eastern Region Fish and Game	PC1-10999	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to read: "3.11.5.4 Controlled Activity Rule - Farming activities including multiple farms with a Farm	Oppose	FFNZ considers that the option of a CIS and permitted activity ought to be provided for farmers and is a reasonable way of dealing with water quality and the issue of the volume of FEPs that will

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Submitter ID: 74085			<p>Environment Plan not under a Certified Industry Scheme Rule 3.11.5.4 Controlled Activity Rule - Farming activities with a Farm Environment Plan not under a Certified Industry Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) where that land use is not registers to a Certified Industry Scheme, and the associated diffuse discharge ... is a permitted activity until:</p> <p>1. 1 January 2020 for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</p> <p>...</p> <p>5. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and</p> <p>After the dates set out in 1), 2) and 3) above the use of land <u>and associated discharges</u> shall be a controlled activity (requiring resource consent), subject to provided it complies with the following standards and terms:</p> <p>a. A Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved</p>		<p>need to be prepared.</p> <p>FFNZ considers that certified FEPs ought not to be subject to control by the Council and refers to its submission on Variation 1.</p> <p>FFNZ opposes allocation of nitrogen and the proposal that properties meet discharge targets. This is for reasons including that it is premature to allocate and there is no reliable basis for measuring nitrogen discharges at a property scale and such an approach will likely impose significant cost for no net benefit.</p> <p>FFNZ considers that the minimum standards in PC1 are too stringent and ought to be amended as proposed in FFNZ's submission on Variation 1. FFNZ opposes the submitter's proposal to make them more stringent through a new Schedule D.</p> <p>FFNZ does not support stringent monitoring of targets or property level discharges for reasons including that there is no reliable basis to measure diffuse discharges and it is not suited to a strict liability regime like the RMA and it will likely impose significant cost for no net benefit.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time as part of the resource consent application is lodged, which must be <u>lodged by</u> the dates specified in I-III below; and</p> <p>...</p> <p><u>e. Nitrogen Discharges from the properties meets the targets and timeframes set out in Schedule E, as assessed by the Regional Council under the methodology contained in Scheduled B (including Updated Nitrogen Leaching Assessments).</u></p> <p>Matters of Control: Waikato Regional Council reserves control over the following matters:</p> <p>i. The content of the Farm Environment Plan, <u>which in any event must be in accordance with Schedule 1.</u></p> <p><u>i1. Buffers, as specified in Schedule D.</u></p> <p>...</p> <p>iii. The actions, timeframes and other measures to determine the diffuse discharge of nitrogen from the property or enterprise, <u>in accordance with Schedule B - as measured by the five year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprises</u></p>		

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			<p>Nitrogen Reference Point, unless other suitable measures are specified. to ensure that nitrogen discharge is reduced to or maintained at the level specified in Schedule E or the level authorised by any nitrogen discharge rights if a trading scheme is operative within the catchment.</p> <p>iv. Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026.</p> <p>...</p> <p>vi. The monitoring, record keeping, reporting and information provision, including public information provision, requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</p> <p>vii. The timeframe and circumstances under which the consent conditions may be reviewed or the Farm Environment Plan shall be amended.</p> <p>viii. Procedures for reviewing, amending and re-certifying re-approving the Farm Environment Plan the resource consent including:</p> <p>a) Periodic reviews in accordance with the sub-catchment progress review timeframes as specified in</p>		

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			<p><u>Table 3.11-2.</u> <u>b) Reviews, initiated by the consent holder under section 128 on the purchase or sale of any nitrogen discharge rights under any operative catchment nitrogen trading scheme, in order to change the level of discharge authorised by the consent in clause iii.</u> Dates: I. For Priority 1 sub-catchments, and properties with a Nitrogen Reference Point of greater than 75th percentile nitrogen leaching values, by 1 July 2020 ... Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons. <u>Reviews will be subject to limited or public notification based on progress against the sub-catchment progress review targets and timeframes specified in Table 3.11-2."</u></p>		
Bailey, James Submitter ID: 73926	PC1-9046	Rule 3.11.5.4	<p>DELETE the Rule 3.11.5.4 requirement to manage property level discharges to a Nitrogen Reference Point based on historic profiles AND AMEND PPC1 to apply Land Use Suitability and Natural Capital now by including allocation based on the Natural Capital of soils through a Land Use Capability approach</p>	<p>Support in part Oppose in part</p>	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to provide a flexibility cap for low leaching farm systems below a certain threshold (20kg/N/ha/yr) that is deemed as a sustainable level for the transition period, with farmers with a Nitrogen Reference Point below this enabled to increase up to this point.		<p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ considers that discharges of contaminants from farming activities ought to be managed through tailored and proportionate FEPS. FFNZ considers that there is insufficient information or proxy or reliable basis to manage nitrogen on the basis of natural capital.</p> <p>FFNZ supports flexibility for low nitrogen emitters to increase and refers to the changes it proposes for Rule 2 in its submission on Variation 1.</p>
Balle Bros Group Submitter ID: 67834	PC1-11425	Rule 3.11.5.4	<p>AMEND Rule 3.11.5.4 to read: '...1. 1 January 2020 for properties or enterprises in Priority 1 sub-catchment listed in Table 3.11-2, "and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentiles nitrogen leaching value;"</p> <p>...</p> <p>"5. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and after the dates set out in 1), 2) and 3) above the use of</p>	Oppose in part	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p> <p>In principle, FFNZ supports an approach that requires the 75th percentile to reduce but FFNZ considers that further consideration needs to be given to the appropriate spatial scale (e.g. the</p>

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			<p>land shall be a controlled activity (requiring resource consent), subject to the following standards and terms:"</p> <p>...</p> <p>"c. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent application is lodged;" and...'</p>		<p>Upper Waikato FMU is too large and varied) and to how the NRP is calculated. FFNZ refers further to its submission on Variation 1.</p>
<p>Beef + Lamb New Zealand Limited Submitter ID: 73369</p>	<p>PC1-11503</p>	<p>Rule 3.11.5.4</p>	<p>AMEND Rule 3.11.5.4 (1) as follows: "...and properties or enterprises with a Nitrogen Reference Point greater than the 75th 50th percentile Nitrogen leaching value that are also within a sub-catchment which is currently over allocated in relation to Nitrogen (Table 3.11-1 and 3.11-2); AND AMEND to include new standard that by 2096 the activity does not cause or contribute materially to an exceedance of the water quality 80 year targets for its specific sub- catchment as set out in Table 3.11-1. AND AMEND Schedule 1 as set out in this submission. AND AMEND Schedule C as set out in this submission. AND AMEND timeframes for the requirement to complete and register Farm Environment Plans. AND ADD under 'matters of control (ii) reference to the sub-catchment</p>	<p>Oppose</p>	<p>FFNZ is concerned that the 75th percentile is likely to impose significant cost and is concerned about how potentially more significant it would be if it was changed to the 50th percentile.</p> <p>In principle, FFNZ supports an approach that requires the 75th percentile to reduce but FFNZ considers that further consideration needs to be given to the appropriate spatial scale (e.g. the Upper Waikato FMU is too large and varied) and to how the NRP is calculated. FFNZ refers further to its submission on Variation 1.</p> <p>FFNZ does not support the 80 year targets or an approach that determines whether a sub-catchment is over allocated on the basis of those numbers.</p> <p>FFNZ does not support the amendments proposed by the submitter to Schedules 1 and C. FFNZ considers they ought to be amended as proposed in its submission on Variation 1.</p> <p>FFNZ agrees that the timeframes ought to be amended, particularly in light of the two year delay</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>water quality outcomes and sub-catchment specific issues. Reductions of contaminant discharges may not always be required;</p> <p>AND AMEND matter of control clause (iii) as follows: The actions, timeframes and other measures to ensure that the diffuse discharge of Nitrogen from the property or enterprise, as measured by the five-year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified does not cause or materially contribute to exceedance of the sub-catchment Nitrogen attributes/targets in Table 3.11-1 by 2096.</p> <p>AND DELETE reference to the 75th percentile in Rule 3.11.5.4 (iv) AND REPLACE with <u>“for catchments which are currently over allocated for Nitrogen, actions , timeframes, and other measures to ensure the diffuse discharge of Nitrogen is reduced over the term of consent proportionate to the level of over allocation and the contribution that activity makes to the over allocation. Over allocation to be phased out by 50 percent by 2047.”</u></p> <p>AND ADD reference to Nitrogen</p>		<p>following notification of PC1.</p> <p>FFNZ considers that the reference ought to be catchment profiles as proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support WRC having control over the actions, timeframes etc and considers they ought to be determined by a CFEP.</p> <p>FFNZ does not support an approach that assesses over allocation on the basis of the 80 year targets then takes steps to reduce over allocation by 50% in 2047. FFNZ's concerns include that this is arbitrary, based on flawed assumptions and will likely impose significant cost for no net benefit.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ considers that the focus ought to be on tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that biodiversity is beyond the</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>discharge limit(s) (based on an estimate or band for land use capability or suitability), as set out under Policy 1 AND require consideration of Nitrogen discharge reductions through the consent where sub-catchment discharge thresholds are exceeded.</p> <p>AND AMEND to enable land uses to discharge to a series of Nitrogen discharge thresholds based on a sub-catchment assessment of Land use capability, or suitability.</p> <p>AND AMEND to tailor environmental mitigation to critical source identification and management.</p> <p>AND AMEND to recognise and provide for existing biodiversity values and enhancement of biodiversity values (in accordance with Policy 17).</p> <p>AND AMEND to take into account the degree to which land use is optimised in relation to the natural capital of soils, and sub-catchment water quality 80 year attributes targets (Table 3.11-1).</p> <p>AND AMEND to enable consents to be granted for a term of 35 years.</p> <p>AND AMEND Rule 3.11.5.4 so that it gives effect to amended Policies 1 and 2 and including Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and requires the application of Best Practicable Option to avoid,</p>		<p>scope of PC1 and is concerned about the significant cost this will likely impose for no net benefit.</p> <p>FFNZ agrees that consents ought to be granted for up to 35 years.</p> <p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.		
Cameron, Bruce Submitter ID: 60603	PC1-6398	Rule 3.11.5.4	<p>AMEND Rule 3.11.5.4 to remove the Nitrogen Reference Point.</p> <p>AND AMEND PPC1 to address contaminants on a Sub-catchment bases targeting the highest emitting sub-catchments.</p> <p>AND AMEND Rule 3.11.5.4 so the duration of consent is 15 years or more.</p> <p>AND INCLUDE clarification around stock exclusion requirements, ie setback buffers and where to measure setback from on undulating land.</p> <p>AND INCLUDE clarification around how long a Farm Environment Plan will be viable for.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ agrees that consents ought to be for 15 years or more.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ considers that clarity around how long a FEP will be viable for and a procedure for amendment ought to be provided for in Schedule 1 (with consequential amendments to the rules, FFNZ refers to its submission on Variation 1).</p>
Charion Investment Trust Submitter ID: 71344	PC1-7793	Rule 3.11.5.4	<p>Rule 3.11.5.4: DELETE all the rules and schedules as appropriate to remove provisions for land use consent terms and conditions. AND RETAIN the use of rules for the control and reduction of nitrogen, phosphorous, sediment and microbial pathogens. AND AMEND the Rules to ensure the following conditions apply to a controlled activity (after 1 July 2020):</p> <p><u>"1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</u></p> <p><u>2. A Nitrogen Reference Point is calculated for the property or enterprise in conformance with Schedule B and was provided to the Waikato Regional Council within the period 1 September 2018 to 31 March 2019; and</u></p> <p><u>3. The five year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which the Nitrogen Reference Point is provided to the Waikato Regional</u></p>	Oppose in part	<p>FFNZ considers that a reasonable consenting framework needs to be provided and considers this can be achieved through the consenting framework proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that the rules need to be hybrid land use and discharge rules due to the nature of diffuse discharges e.g. they cannot be directly measured.</p> <p>FFNZ supports a prioritised approach and refers to the reasons in FFNZ's submission on Variation 1. While FFNZ may not necessarily agree with how the sub-catchments have been prioritised, it considers that it is an appropriate way of focusing on hot spots and managing the significant number of FEPs that will need to be prepared.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>Council; and</u> <u>4. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C."</u> AND REMOVE from the Rules the reference to priority catchments and associated dates from the Matters of Control in the rules. AND AMEND Rule 3.11.5.4 to split the rule into a permitted rule (until 30 June 2020) and a controlled rule (applying from 1 July 2020). AND AMEND the Rules to ensure the following conditions apply to a controlled activity (after 1 July 2020): <u>"1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</u> <u>2. A Nitrogen Reference Point is calculated for the property or enterprise in conformance with Schedule B and was provided to the Waikato Regional Council within the period 1 September 2018 to 31 March 2019; and</u> <u>3. The five year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; and</u> <u>4. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C."</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND REMOVE from the Rules the reference to priority catchments and associated dates from the Matters of Control in the rules.		
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10800	Rule 3.11.5.4	<p>AMEND Rule 3.11.5.4 to read: "Rule 3.11.5.4 - Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme Except as provided for ... is a permitted activity until: 1. 1 January 2020 for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value; 2. 1 January 2023 for properties or enterprises in Priority 2 sub-catchments listed in Table 3.11-2; 3. 1 January 2026 for properties or enterprises in Priority 3 sub-catchments listed in Table 3.11-2; <u>provided the property or enterprise complies with the region-wide GMPs for pastoral land use;</u>... Matters of Control Waikato Regional Council reserves control over the following matters: ii. The actions and timeframes for undertaking mitigation actions <u>identified in the Farm Environment Plan that will maintain identified low</u></p>	Oppose	<p>FFNZ supports prioritising properties in the 75th percentile but notes that it has concerns about how sub-catchments have been prioritised and refers to its submission on Variation 1. In principle, FFNZ supports an approach that requires the 75th percentile to reduce but FFNZ considers that further consideration needs to be given to the appropriate spatial scale (e.g. the Upper Waikato FMU is too large and varied) and to how the NRP is calculated.</p> <p>In principle, FFNZ agrees that farming activities ought to comply with industry agreed GMP. However, FFNZ is concerned that requiring this as a permitted activity standard may result in a “one size fits all” approach. It considers that a better approach is to require these activities to obtain a simplified FEP as set out in FFNZ’s submission on Variation 1.</p> <p>FFNZ also refers to the changes to Rule 4 and reasons for this set out in its submission on Variation 1, e.g. Council should not have control over actions and timeframes (as FEPs are prepared by a CFEP) and accordingly FFNZ does not agree with the proposed amendments to paragraph ii.</p>

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			levels of, or reduce the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens to water or to land where they may enter water."		
Cotman, Jim Submitter ID: 59884	PC1-4589	Rule 3.11.5.4	<p>WITHDRAW PPC1 AND REPLACE with a new plan that endorses 'Best Practical Options' that are developed by landowners</p> <p>AND AMEND to provide a new plan that supports the development and implementation of Catchment Management Plans that are led by landowners</p> <p>AND ENSURE this new plan supports identifying potential critical source contaminant pathways on a sub-catchment basis to provide quantifiable measures and factual information into Catchment Management Plans</p> <p>AND ENSURE the new plan encourages innovative new science that provide alternative means to managing water quality</p> <p>AND ENSURE the new plan recognises that well informed landowners as stewards of their land are the best and only people who can create action on the ground</p> <p>AND ENSURE the new plan approach favours a 'shared values' approach where all parties work toward achieving sensible water quality targets</p>	Support in part	<p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate. FFNZ agrees that robust science and information is required over the lifetime of this plan.</p> <p>FFNZ agrees that landowners ought to be involved in the preparation of FEPs and in the development of mitigations.</p> <p>FFNZ considers that a rules framework is needed but that this ought to provide a reasonable consenting or permitted activity pathway as proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that koi carp need to be addressed and that the focus ought to be on all sources of contaminants, not just diffuse discharges from farming activities.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND ENSURE that the primary focus of the new plan is a comprehensive programme to eliminate Koi Carp along with the native species predator, catfish.		
Department of Conservation Submitter ID: 71759	PC1-11057	Rule 3.11.5.4	AMEND Rule 3.11.5.4(5)(d) to exclude sheep. AND AMEND Rule 3.11.5.4 by clarifying the activity status as to whether it is a controlled or permitted activity.	Oppose	FFNZ considers that the cost of excluding sheep significantly outweigh any benefit. FFNZ considers there is sufficient clarity that Rule 4 is a controlled activity.
Dudin, Alan and Sarah Submitter ID: 73852	PC1-4906	Rule 3.11.5.4	DELETE Rule 3.11.5.4 (5). AND AMEND so that nitrogen leaching limits are set based on the natural capital on the land. The allocation of leaching limits allocated to Land Use Capability (LUC) units. AND AMEND so that the Waikato Regional Council revisits the Nitrogen leaching limit allocations on the LUC system as OVERSEER modelling is improved and subsequent versions are released. AND AMEND so that all farming industries be treated equally [permitted activity/require resource consent]. AND AMEND so that drystock farming be a Permitted Activity with an active Land and Environment Plan, provided by Environment Waikato or a Certified Farm Environment Planner. AND AMEND so that Farm Environment Plans to be monitored/	Support in part Oppose in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance. FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit. FFNZ considers that it is appropriate to have the option of a permitted activity or controlled activity.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>audited by certified Environment Waikato auditors on a regular basis.</p> <p>Stock Exclusion: AND AMEND Schedule C amended to state 'best practicable option' to exclude livestock. AND AMEND to provide a clear definition of a 'livestock' in schedule C and 'cattle, horses, deer, and pigs'. AND AMEND to provide a clearer definition of a waterbody, such as 'wider than 1 metre, surface water deeper than 0.5 m for 80% of a year' to provide certainty. AND AMEND to provide a clear definition of a 'stock proof natural barrier'. AND AMEND to provide greater flexibility to cattle grazing on slopes over 15 degrees, acknowledging that best practices such as rotation grazing at times when runoff of sediment would be low. (for example summer months, and low flows, or fast rotation such as 12 grazing days spread over a 12 month period). AND AMEND to be consistent with the Sustainable Dairy Accord, require a crossing if stock are crossing on a frequency basis, and where 'practicable'. AND AMEND to introduce the stock exclusion at a staged rate, to provide certainty and supporting science at the 10 year review. That water bodies</p>		<p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			on land with a slope less than 15 degrees be fenced to exclude livestock in the first 10 years. With the review there is the expectation that there will be more supporting science and results from this, and then can consider whether to introduce the next stage.		
Farmers 4 Positive Change (F4PC) Submitter ID: 73355	PC1-10427	Rule 3.11.5.4	<p>DELETE the Rule 3.11.5.4 Nitrogen Reference Point AND AMEND to introduce a sub-catchment planned approach with the Farm Environment Plan as a monitoring tool AND AMEND Rule 3.11.5.4 to bring stock exclusion into line with the National Stock Exclusion requirements, which relate to exclusion of cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat land and rolling land, but not on hill country AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards AND DELETE any provisions that hold land uses to historic discharge levels or stocking rates AND AMEND Rule 3.11.5.4 to use Farm Environment Plans as a tool to understand land use suitability and manage contaminant loss</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to include a range of actions in Farm Environment Plans, such as avoid farming older cattle on slopes in winter or when wet; farm cattle extensively on slopes; fence off swamps and plant out to provide silt traps to remove sediment; construct sediment traps near the headwaters to help slow flow and trap sediment; plant shade trees away from waterways to discourage stock camps and nutrient build-up; use temporary electric fencing where and when necessary; plant poplar poles on erosion prone slopes; identify suitable units for planting pines at farmer discretion; fence off waterways on more intensively farmed areas of the farm and provide reticulated water for stock.		<p>something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ considers that LUS is not sufficiently developed to allocate or to be used as a decision support tool. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC or LUS is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>While LUC may have a role to play as one of many decision support tools, FFNZ considers that it should not be mandatory to adopt LUC or LUS.</p> <p>FFNZ does not support blanket or no tailored requirements or input controls, including those proposed by this submitter e.g. avoiding older cattle on hills. FFNZ considers that this is more appropriately addressed through tailored FEPs that consider critical source areas on each property.</p>
FarmRight Submitter ID: 73720	PC1-5398	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to be a permitted activity.	Support in part	FFNZ considers that it is important and helpful for farmers to have the option to either comply with permitted standards or to obtain a resource consent (particularly if consents are granted for terms of 15 years or more).
Fertiliser Association of New Zealand Submitter ID:	PC1-10626	Rule 3.11.5.4	AMEND Matter of Control (iv) to read: "Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes	Support in part Oppose in	In principle, FFNZ agrees that the approach ought to be to adopt BPO (as defined in FFNZ's submission on Variation 1 and not based on input controls as some submitters have proposed) and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
73305			and other measures to ensure reduce the diffuse losses discharge of nitrogen to water using best practicable options in keeping with industry agreed good management practice, prior to a nitrogen loss allocation system being decided and introduced is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026."	part	industry agreed GMP. However, FFNZ considers that this should not be a rigid requirement and that there is a need to tailor the approach to the particular farm.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10500	Rule 3.11.5.4	AMEND Rule 3.11.5.4 and reorder to read: "Rule 3.11.5.42A – Controlled Permitted Activity Rule – Pre-2020 Farming activities with a Farm Environment Plan not under a Certified Industry Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2, until January 2020 , the use of land for farming activities... entering water is a permitted activity until: " AND DELETE Points Bullets 1,2 and 3. "Subject to the following conditions: 41. The property is registered with the Waikato Regional Council in conformation with Schedule A; and 52. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and provided to Waikato Regional Council within the period 1	Support in part Oppose in part	FFNZ agrees that provision ought to be made to the activity status for farming activities not permitted by a CIS. However the date of 2020 will need to change in light of the delay since notification of PC1 and would need to reflect the dates for prioritised sub-catchments. FFNZ does not support a requirement that all FEPs are obtained on the same date. FFNZ supports a five year rolling average and is concerned that three year rolling average is not sufficient time to reflect likely seasonal and other fluctuations that impact on the NRP. FFNZ considers that Rule 4 ought to be amended as proposed in FFNZ's submission on Variation 1 and not as proposed by this submitter. FFNZ's concerns include that the proposed changes will impose significant cost for no net benefit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>September 2018 to 31 March 2019;</u> and After the dates set out in 1), 2) and 3) above the use of land shall be a controlled activity (requiring resource consent), subject to the following standards and terms: a. A Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time the resource consent application is lodged by the dates specified in 1-III below; and b. The property is registered with the Waikato Regional Council in conformance with Schedule A; and c. A Nitrogen Reference point is produced for the property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent application is lodged; and 3. <u>The three year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; and</u> d4. <u>Cattle, horses, deer and pigs are excluded from water bodies in</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>conformance with Schedule C." AND ADD a replacement Rule 3.11.5.4 as follows: <u>"Rule 3.11.5.4 – Controlled Activity Rule – From 2020 farming activities with a Farm Environment Plan not under a Certified Industry Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2, from 1 January 2020, the use of land for farming activities (excluding commercial vegetable production) where that land use is not registered to a Certified Industry Scheme, and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a controlled activity subject to the following standards and terms:</u> 1. <u>The property is registered with the Waikato Regional Council in conformance with Schedule A; and</u> 2. <u>A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent is lodged; and</u> 3. <u>Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and</u> 4. <u>Farm Environment Plan has been prepared in conformance with</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time the resource consent application is lodged; and</u></p> <p><u>5. Annual records of the nitrogen leaching value are kept and submitted to the Waikato Regional Council by 1 July each year demonstrating that the three-year rolling average nitrogen leaching value as determined using the most recent version of OVERSEER is not, over the duration of the consent, increased beyond the property or enterprise's Nitrogen Reference Point.</u></p> <p><u>Matters of Control</u></p> <p><u>Waikato Regional Council reserves control over the following matters:</u></p> <p><u>i. The content of the Farm Environment Plan, provided that the Farm Environment Plan is no less stringent than specified in Schedule 1.</u></p> <p><u>ii. The actions and timeframes for undertaking mitigation actions that maintain or reduce the diffuse discharges of phosphorus, sediment or microbial pathogens to water or to land where they may enter water.</u></p> <p><u>iii. The three-year rolling average annual nitrogen loss rate (except that, in accordance with standard 5 no</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>such nitrogen loss shall exceed the Nitrogen Reference Point).</u> <u>iv. Compliance with Policy 2.</u> <u>v. The duration of the consent.</u> <u>vi. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</u> <u>vii. The timeframe and circumstances under which the consent conditions may be reviewed of the Farm Environment Plan shall be amended.</u> <u>viii. Procedures for reviewing, amending and re-approving the Farm Environment Plan."</u></p>		
Glenshee Trust Submitter ID: 73028	PC1-1870	Rule 3.11.5.4	<p>AMEND 3.11.5.4 if the use of the Nitrogen Reference Point is continued, consider using long term averaging of nitrogen losses. This provides more ability to cope with yearly changes that frequently occur within biological systems AND AMEND by giving further consideration to alternative tools such as the use of the natural capital approach AND AMEND by utilising tools such as Farm Menus developed by Waikato Regional Council as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the</p>	<p>Support in part Oppose in part</p>	<p>FFNZ considers that the NRP ought to be calculated on a five year rolling average for reasons including that flexibility is needed e.g. during drought which may increase nitrogen if stock are not able to be sold (see FFNZ's submission on Variation 1).</p> <p>In principle, FFNZ acknowledges that LUC could be used as a on farm decision support tool used as one of a range of tools to help identify critical source areas and assess mitigations. However, FFNZ considers that it is not a proxy for nitrogen or a basis for allocation and considers that there is no suitable proxy for "natural capital." FFNZ considers that a more appropriate way to manage nitrogen (and other contaminants) is through tailored and proportionate FEPs with critical source areas identified and mitigations assessed using FFNZ's</p>

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			<p>OVERSEER Model AND AMEND where Overseer is to be used as part of the creation of solutions then the calculations must be used as a guide only and the focus to be on the trends used AND AMEND Rule 3.11.5.4 stock exclusion provisions by considering in depth the implications of stock exclusion on steeper and more extensive hill country AND AMEND stock exclusion provisions by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority AND AMEND stock exclusion provisions by giving consideration to alternative solutions on steep land such as water reticulation installation AND AMEND stock exclusion provisions by giving consideration to matching land use capability rather than directly to slope which is a simplistic measure AMEND Rule 3.11.5.4 Farm Environment Plan provisions by providing an industry wide capability assessment to assess who will complete Farm Environment Plans AND AMEND Farm Environment Plan provisions to showing land owners and the industry how these are to be constructed and how the</p>		<p>MPA framework (FFNZ refers further to its submission on Variation 1).</p> <p>FFNZ supports a “farm menu” type approach and considers that its MPA framework provides for a similar assessment.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ’s submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ agrees that there will likely be a shortage in CFEPs and considers that provision for that e.g. industry wide capability, ought to be provided for.</p> <p>FFNZ is concerned that by amending the FEP provisions to show landowners and industry how they can be constructed will result in them becoming too rigid and not sufficiently tailored.</p>

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			gains are quantified AND AMEND by providing clarity as to how the monitoring of Farm Environment Plans will be undertaken and who will pay for this before land owners commitment to this.		FFNZ considers that this could be addressed through guidance documents provided they were sufficiently flexible.
Greenlea Premier Meats Ltd Submitter ID: 72144	PC1-7545	Rule 3.11.5.4	DELETE requirements for land use activities to not exceed their historic nitrogen discharge levels when below 20kgN/ha/yr. AND AMEND to enable low leaching and land uses (below 20kgN/ha/yr) to increase discharges up to 20kgN/ha/yr. AND AMEND by basing the nitrogen allocation system on the natural capital of soils taking into consideration the assimilative capacity of freshwater.	Support in part Oppose in part	FFNZ agrees that flexibility needs to be provided for low nitrogen discharges to increase. FFNZ prefers the framework in its submission on Variation 1 e.g. simplified FEP and permitted baseline, but would support a threshold of 20kgN if it was supported by a robust section 32 assessment. FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit. In addition FFNZ considers that there is no reasonably proxy for natural capital.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5774	Rule 3.11.5.4	AMEND Rule 3.11.5.4 so that farming activities are permitted subject to application of the Best Practicable Option. AND AMEND by incorporating the minimum standards in the Farm Environment Plan into the rules, including the information requirements contained in the Farm	Oppose	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc.

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			Environment Plan. AND AMEND by removing the reliance on the Nitrogen Reference Points and OVERSEER as a method for assessing compliance.		<p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p>
Hansen, Michael Submitter ID: 73151	PC1-10355	Rule 3.11.5.4	<p>AMEND Rule 3.11.5.4 stock exclusion requirements to be consistent with the government's Clean Water Report (February 2017)</p> <p>AND AMEND the stock exclusion slope requirements to no greater than 15 degrees as per the Clean Water Report (February 2017)</p> <p>AND AMEND the exclusion requirements for cattle and deer on land between 3 and 15 degree slopes so that they apply only to all permanently flowing water bodies 1 metre wide or greater</p> <p>AND AMEND Farm Environment Plan requirements to align the thresholds for mandatory stock exclusion to nationally recommended standards (Clean Water Report February 2017), so that stock exclusion only applies up to a slope</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>of 15 degrees for deer and cattle and only applies to waterbodies 1 metre or wider for deer and cattle on land between 3 and 15 degrees slope AND AMEND the Farm Environment Plan requirements so that stock exclusion fencing is required above the 15 degree threshold for intensive farming operations (>18su/ha), for example winter cropping and strip grazing of dairy cows on hill country AND REPLACE the [Farm Environment Plan and relevant provisions] input standards (such as riparian setbacks and limitations on cultivation) with mitigations set on a farm by farm basis and focused on management of critical source areas AND AMEND the rules to focus on reducing impacts from intensive agriculture >18su/ha rather than on extensive agriculture AND AMEND so that Farm Environment Plans are produced by the landowner with Council guidance and support AND DELETE Schedule 1(A)(5)(a) AND REPLACE with an approach that enables flexibility in nitrogen leaching from hill country sheep and beef farming, and land uses which are low impact (at or below 20kgN/ha/yr) OR apply natural capital allocation AND REMOVE the timeframes, AND</p>		<p>reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ also considers that there is no reliable proxy for natural capital and that it is not appropriate to allocate on this basis.</p> <p>FFNZ supports an approach that provides flexibility for low intensity farmers to increase. It considers that the threshold is likely to be 15kgN or some other permitted baseline (see FFNZ's submission on Variation 1) but would support 20kgN if it was supported by a robust section 32 assessment.</p>

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			REPLACE with an approach that sets timeframes through consultation with the farmer taking into account their financial constraints and the sensitivity of the waterbody to any impact.		
Hill Country Farmers Group Submitter ID: 73321	PC1-7875	Rule 3.11.5.4	<p>AMEND Rule 3.11.5.4 to read: "...</p> <p>1. January 2020 for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value ;</p> <p>2. January 2023 for properties or enterprises in Priority 2 sub-catchments listed in Table 3.11-2;</p> <p>3. January 2026 for properties or enterprises in Priority 3 sub-catchments listed in Table 3.11-2;</p> <p>Subject to the following conditions:</p> <p>4. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</p> <p>5. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and</p> <p>After the dates set out in 1), 2) and 3) above the use of land shall be a controlled activity (requiring resource consent), subject to the following standards and terms:</p> <p>a. A Farm Environment Plan has been prepared in conformance with</p>	Support in part Oppose in part	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p> <p>In principle, FFNZ supports an approach that requires the 75th percentile to reduce but FFNZ considers that further consideration needs to be given to the appropriate spatial scale (e.g. the Upper Waikato FMU is too large and varied) and to how the NRP is calculated. FFNZ refers further to its submission on Variation 1.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>Having said this, FFNZ agrees that the land owner</p>

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			<p>Schedule 1 and has been approved by a Certified Farm Environment Planner or approved landowner, and is provided to the Waikato Regional Council at the time the resource consent application is lodged by the dates specified in I-III below; and b. b. The property is registered with the Waikato Regional Council in conformance with Schedule A; and c. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent application is lodged; and c. d. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs."</p>		<p>needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>
Hurley, Peter James Submitter ID: 71391	PC1-1099	Rule 3.11.5.4	<p>Stock exclusion: DELETE from Rule 3.11.5.4 provisions that relate to excluding cattle from water bodies through permanent fencing in their entirety. OR, if not deleted in their entirety AMEND so that the requirement to exclude cattle through permanent fencing is tailored on a farm by farm basis where there is a proven water quality issue in relation to stock</p>	<p>Support in part Oppose in part</p>	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

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			<p>access to water bodies. Allow flexibility to provide for alternative approaches to achieve the same outcome.</p> <p>AND AMEND so that the ability to muster cattle through a water body without requiring a formed stock crossing structure when crossing less than three times weekly.</p> <p>AND DELETE the 25 degree slope provision in Rule 3.11.5.4 AND ADD farming intensity over 18 stock units per hectare.</p> <p>AND MAKE any consequential amendments.</p> <p>Nitrogen Reference Point: RETAIN nitrogen discharge reductions to the 75th percentile nitrogen leaching value.</p> <p>AND AMEND so that sheep and beef farms and extensive operations (at or under 18 stock units) do not have to manage to a Nitrogen Reference Point.</p> <p>AND AMEND to ensure that when the OVERSEER Model is used, best management practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters.</p> <p>AND AMEND to use Olsen-p from soil tests as a marker for nutrient loss.</p> <p>AND MAKE any consequential</p>		<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p> <p>In principle, FFNZ supports an approach that requires the 75th percentile to reduce but FFNZ considers that further consideration needs to be given to the appropriate spatial scale (e.g. the Upper Waikato FMU is too large and varied) and to how the NRP is calculated. FFNZ refers further to its submission on Variation 1.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's</p>

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			<p>amendments. Farm Environment Plans: AMEND to require Farm Environment Plans only in sub-catchments where science indicates that improvements are required. AND AMEND Farm Environment Plans to allow flexible such as with nitrogen discharges and the application of good management practices. Farm Environment Plans should be tailored to the individual property and focus on critical source management rather than a blanket approach. AND ADD provision for an independent panel that decides on points of contention between farmers and staff. Therefore Farm Environment Plans can be settled without the expense of an Environment Court appeal process. AND MAKE any consequential amendments.</p>		<p>submission on Variation 1.</p>
<p>Lee, Malcolm and Sally Submitter ID: 72932</p>	<p>PC1-8869</p>	<p>Rule 3.11.5.4</p>	<p>AMEND Rules 3.11.5.4 to a sub-catchment approach with communities working together AND RENOTIFY and allow submissions on this sub-catchment approach. AND DELETE from Rule 3.11.5.4 provisions relating to the Nitrogen Reference Point. If not deleted then AMEND to provide for a Land Use Capability Approach OR AMEND to provide for a sub-</p>	<p>Support in part Oppose in part</p>	<p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>catchment approach to allow catchments to monitor its own land use and nitrogen loading to maintain levels at current levels.</p> <p>AND AMEND to provide for the National Policy Statement for Freshwater Management be adopted as the standard for stock exclusion.</p> <p>AND AMEND to provide for the definition for waterway for stock exclusion to be adopted as 1 metre wide and 300 mm deep.</p> <p>AND AMEND to only fence waterways that fit the criteria 1 metre wide and 300mm deep that is less than the 15 degree slope.</p> <p>AND AMEND to extend the timeframes for completion of stock exclusion.</p> <p>AND AMEND to provide for encouragement for water reticulation and shade shelter trees for areas above 15 degrees slope.</p> <p>AND AMEND to clarify the ability to use temporary/semi-permanent or permanent fences.</p> <p>AND AMEND to ensure Farm Environment Plans are not bound to title and if bound to title, do not include personal goals.</p> <p>AND AMEND to provide for a template to allow farmers to work and prepare their own Farm Environment Plans.</p> <p>AND AMEND to focus on mitigation</p>		<p>out in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p>

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			<p>rather than rules. AND AMEND to reconsider the level of impact on smaller areas of adverse events OR AMEND to provide for more flexibility in Farm Environment Plans for small local adverse events. AND AMEND to provide for the adjustment to PPC1 to contain rules for the elimination of Koi Carp and ensure the cost of this is not put on farmers. AND AMEND to provide for water quality improvements required by farmers, be linked to sub-catchments to link the effects caused by farmers either individually or collectively and consider the impacts that are outside farmers control. AND MAKE any consequential amendments arising from the submission process.</p>		<p>Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP.</p>
<p>Maniapoto Maori Trust Board Submitter ID: 73730</p>	<p>PC1-9342</p>	<p>Rule 3.11.5.4</p>	<p>AMEND Rule 3.11.5.4 to relist items 4 and 5 to become a and b. AND AMEND Matters of Control to read: "Waikato Regional Council... ii. The actions and timeframes for undertaking <u>implementing and putting in place</u> mitigation actions <u>identified in Farm Environment Plan</u> that <u>will</u> maintain <u>identified low levels of</u>, or reduce the diffuse... iii. The actions, timeframes and other... unless other suitable <u>and identified</u> mitigations are... vii. The timeframe and</p>	<p>Oppose</p>	<p>FFNZ refers to the changes to Rule 4 and reasons for this set out in its submission on Variation 1, e.g. Council should not have control over actions and timeframes (as FEPs are prepared by a CFEP) and accordingly FFNZ does not agree with the proposed amendments to paragraphs ii and iii.</p> <p>FFNZ considers that sufficient flexibility is needed to respond to things like climatic events, economic downturn, animal welfare etc. It is concerned that Council is not in the business of farming, Council ought to have control certification of the planner not the content of the FEP or timing of actions.</p>

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			circumstance... Farm Environment Plan shall be amended..."		
Matamata-Piako District Council Submitter ID: 73419	PC1-3701	Rule 3.11.5.4	AMEND Rule 3.11.5.4 so that it provides a fair allocation approach and work with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes.	Support in part Oppose in part	FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ considers that discharges of contaminants from farming activities ought to be managed through tailored and proportionate FEPs. FFNZ agrees that the community ought to be engaged but considers the answer is through a range of interventions including whole of catchment action plans (provided they are non regulatory), tailored FEPs, consistency in approach across urban/rural and all sources of discharges, and as further explained in FFNZ's submission on Variation 1.
Matira Sub Catchment Group Submitter ID: 74148	PC1-9297	Rule 3.11.5.4	DELETE Rule 3.11.5.4 in its entirety OR AMEND to provide a land use suitability and a sub-catchment method that would work better AND AMEND to apply the National Policy Statement for Freshwater Management AND AMEND to adopt the Clean Waters policy as the standard.	Oppose in part	FFNZ considers that Rule 4 requires significant amendment but considers that it ought to be retained (subject to changes as set out in FFNZ's submission on Variation 1). FFNZ supports a sub-catchment approach but not an LUS approach for reasons including that LUS is not well developed, it is not reasonable or appropriate to allocate nitrogen and such an approach is likely to result in significant cost for no net benefit.
Mercury NZ Limited Submitter ID: 73182	PC1-9600	Rule 3.11.5.4	RETAIN Rule 3.11.5.4 AND AMEND Rule 3.11.5.4 to read: "3.11.5.4 Controlled Activity Rule - Farming activities with a Farm Environment Plan not under a Certified Industry Sector Scheme... Rule 3.11.5.4 - Controlled Activity Rule - Farming activities with a Farm Environment Plan not under a Certified Industry Sector Scheme Except as provided for in Rule	Support in part Oppose in part	FFNZ considers that the name of the CIS ought to reflect what it is but is concerned that "sector" is not the right term. FFNZ also considers that Rule 4 requires further amendments as set out in its submission on Variation 1.

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			3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) where that land use is not registered to a Certified <u>Industry Sector Scheme....</u> "		
New Zealand Forest Owners Association Inc Submitter ID: 73524	PC1-9961	Rule 3.11.5.4	DELETE reference to Nitrogen Reference Points as a method for assessing compliance AND any consequential amendments.	Oppose in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11861	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to relist items 4 and 5 to become a and b. AND AMEND Matters of Control to read: "Waikato Regional Council... ii. The actions and timeframes for undertaking <u>implementing and putting in place</u> mitigation actions <u>identified in Farm Environment Plan that will maintain identified low levels of,</u> or reduce the diffuse... iii. The actions, timeframes and other... unless other suitable <u>and identified</u> mitigations are... vii. The timeframe and circumstance... Farm Environment Plan shall be amended..."	Oppose	FFNZ refers to the changes to Rule 4 and reasons for this set out in its submission on Variation 1, e.g. Council should not have control over actions and timeframes (as FEPs are prepared by a CFEP) and accordingly FFNZ does not agree with the proposed amendments to paragraphs ii and iii. FFNZ considers that sufficient flexibility is needed to respond to things like climatic events, economic downturn, animal welfare etc. It is concerned that Council is not in the business of farming, Council ought to have control certification of the planner not the content of the FEP or timing of actions.
Ngati Haua Tribal Trust Submitter ID: 73025	PC1-1971	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to provide for the long term averaging of nitrogen losses. AND AMEND to include alternative	Support in part Oppose in	FFNZ supports the calculation of the NRP on the basis of a five year rolling average and with a longer benchmarking period and with flexibility for the use of Overseer as set out in FFNZ's submission on

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>tools such as the use of the natural capital approach.</p> <p>AND AMEND by utilising tools such as MENUs as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model.</p> <p>AND AMEND where Overseer is to be used as part of the creation of solutions, calculations must be used as a guide only and the focus to be on the trends that are used.</p> <p>AND AMEND to address the implications of stock exclusion on steeper and more extensive hill country.</p> <p>AND AMEND by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority.</p> <p>AND AMEND to consider alternative solutions on steep land such as water reticulation installation.</p> <p>AND AMEND to match land use capability rather than directly to slope.</p> <p>AND CONSIDER undertaking an industry wide capability assessment to assess who will complete the plans.</p> <p>AND AMEND to show land owners and the industry how these are to be</p>	part	<p>Variation 1.</p> <p>FFNZ considers that there is no robust “natural capital” approach currently available and is concerned that this will result in an allocation approach based on LUC (which FFNZ opposes).</p> <p>FFNZ agrees that alternative options or models to Overseer ought to be provided for.</p> <p>FFNZ considers the stock exclusion minimum standards ought to be amended to provide for hill country and extensive farming e.g. assess the requirements on 18 stock units (or a similar approach that looks at intensity) as set out in FFNZ's submission on Variation1.</p> <p>FFNZ does not support matching land use to capability because there is no measure of capability that would take into account all natural capital or no measure that is a reasonable proxy for contaminant discharges.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			constructed and how the gains are quantified. AND AMEND to provide clarity as to how the monitoring of these plans will be undertaken and who will pay for this.		
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8113	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to a permitted activity to read: " ...Except provided for in Rule 3.11.5.1 and Rule 3.11.5.2 The use of land for farming activities (excluding commercial vegetable production) where that land use is <u>greater than 20 ha and</u> not registered to a Certified Industry Scheme, and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a permitted activity <u>subject to the following conditions: until:</u> "... AND DELETE clauses 1-5, 'Matters of control' and 'Dates' AND REPLACE with the following: <u>"1. The property is registered with the Waikato Regional Council in conformance with Schedule A;</u> <u>2. The Best Practicable Options set out in Schedule D are complied with;</u> <u>3. From 31 March 2018 the following information must be provided to the Waikato Regional Council by 1 September each year</u> a. Annual stock number; and	Oppose	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc. FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>b. Annual fertiliser use; and</u> <u>c. Annual brought in animal feed.</u> <u>d. The requirements in Schedule A</u> [note: a to d may not be necessary in light of (e)] <u>e. A description of nutrient management practices including a nutrient budget for the farm enterprise calculated using the model OVERSEER in accordance with the OVERSEER use protocols, or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council."</u> AND IF the relief sought [to change the controlled activity to a permitted activity] is not accepted THEN AMEND to address the matters raised in the submission including the matters of control AND AMEND PPC1 to add a NEW Schedule - Schedule D, Best Practicable Options for farming activities and where the permitted standards in schedule D cannot be complied with then restricted discretionary activity [refer to appendix 3 of the submission]. including:</p> <ul style="list-style-type: none"> • waterways to be fenced and all domestic animals excluded (except sheep) with BMP buffers, • basic stock intensity index applied, 		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<ul style="list-style-type: none"> • effluent, feedlot, standoff and feedpads to be managed, • fertiliser and irrigation applied according to BMP code of practice, • phosphorus application, arable cropping land winter forage crops limited, • irrigation applied to a code of practice, • commercial vegetable cropping BPOs developed <p>[The submission notes that Schedule D is an indicative approach to the type of Best Practicable Options for farming activities].</p>		
Perrin Ag Consultants Ltd Submitter ID: 73859	PC1-3392	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to ensure that requirements to reduce nitrogen leaching to the 75th percentile nitrogen leaching value take into account factors such as soil type and management systems.	Support	In principle, FFNZ supports an approach that requires the 75 th percentile to reduce but FFNZ considers that further consideration needs to be given to the appropriate spatial scale (e.g. the Upper Waikato FMU is too large and varied) and to how the NRP is calculated. FFNZ refers further to its submission on Variation 1.
Pinnell, Graham Submitter ID: 74007	PC1-4374	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to recognise the value of experiential learning and adaptive management AND ENSURE focus is on monitoring, including trend monitoring of E.coli, phosphorus, ammonia and clarity during summer low flow AND AMEND to place an obligation to undertake staged riparian fencing prior to Farm Environment Plan	Support in part Oppose in part	In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available. FFNZ agrees that monitoring ought to focus on summer low flow. FFNZ does not support making the minimum standards more stringent e.g. a requirement to undertake staged riparian fencing

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>deadlines AND AMEND to allow a reasonable time between submitting a Farm Environment Plan and completion of stock exclusion works AND DELETE (5)(v), (vii) and (viii) AND REMOVE from Rule 3.11.5.4 the Nitrogen Reference Points AND ADD a cap for nitrogen discharges AND REPLACE with the requirement to adopt Best Management Practice for nitrogen leaching AND AMEND to require farmers to submit an annual return under 3.11.5.2(5) to enable Council to monitor trends in land use intensity.</p>		<p>prior to an FEP.</p> <p>FFNZ agrees that a reasonable period of time ought to be provided for implementation of mitigations including stock exclusion works.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP but only if it is referred to in non regulatory methods and not part of the rules. FFNZ considers that GMP ought to be considered as part of the MPA assessment of mitigations when preparing a FEP as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that the requirement to submit an "annual return" is too stringent and rigid. FFNZ's concerns also include confidentiality and privacy concerns and concerns that the information will be used to allocate contaminants.</p>
<p>Primary Land Users Group Submitter ID: 71427</p>	<p>PC1-11177</p>	<p>Rule 3.11.5.4</p>	<p>AMEND Rule 3.11.5.4 to read: "...1. 1 January 2020 for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, and properties and enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value:</p>	<p>Support in part Oppose in part</p>	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>... 5. A Nitrogen Reference Point is produced for the property or enterprise in accordance with Schedule B; and After the dates set out in 1), 2) and 3) above the use of land shall be a controlled activity (requiring resource consent), subject to the following standards and terms: ... c. A Nitrogen Reference Point is produced for property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent application is lodged; d. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs." AND REMOVE the Nitrogen Reference Point from PPC1 AND AMEND to align fencing requirements to align with the National Policy Statement for Freshwater Management.</p>		<p>enforcement and compliance.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>
R.P O'Connor and Sons Ltd Submitter ID: 71651	PC1-6970	Rule 3.11.5.4	<p>DELETE the use of the Nitrogen Reference Point and the use of the OVERSEER Model from PPC1 AND AMEND PPC1 to use a sub-catchment approach to address</p>	<p>Support in part Oppose in part</p>	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>contaminants that are relevant to each farm AND use Farm Environment Plans to determine the best scenario for each farm, and science to determine which contaminants are an issue in each sub-catchment AND AMEND the rules so that they are not based on 'grandparenting' AND AMEND the stock exclusion provisions of PPC1 so where the gradient makes fencing awkward, wetland silt traps/silt traps should be available as an option before discharging water downstream AND RETAIN the Farm Environment Plan provisions of PPC1 AND AMEND PPC1 so the individual Farm Environment Plan mitigates against contaminants relevant to each farm rather than using a blanket approach AND AMEND the Farm Environment Plan provisions so it is a simple, workable document similar to a farm business plan with future focussed goals rather than being regulated by one rule.</p>		<p>flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>
Ravensdown Limited Submitter ID: 74058	PC1-10148	Rule 3.11.5.4	<p>RETAIN the permitted/controlled activity status of Rule 3.11.5.4. AND AMEND to split the rule into two parts to clarify when permitted activities become controlled AND AMEND Matters of Control iv. as follows:</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ also supports the permitted/controlled option.</p> <p>In principle, FFNZ agrees that the approach ought to be to adopt BPO (as defined in FFNZ's submission on Variation 1 and not based on input controls as some submitters have proposed) and industry agreed GMP. However, FFNZ considers</p>

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			<p>“iv. Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure <u>reduce the diffuse losses discharge</u> of nitrogen <u>using best practicable options in keeping with industry agreed good management practice, prior to a nitrogen loss allocation system being decided and introduced</u> is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026.”</p>		<p>that this should not be a rigid requirement and that there is a need to tailor the approach to the particular farm.</p>
<p>Reeves and Taylor, James Gordon Livingston and Amy Louise Submitter ID: 71614</p>	<p>PC1-8595</p>	<p>Rule 3.11.5.4</p>	<p>AMEND Rule 3.11.5.4 to read: "5 (d). Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C. <u>The consent holder performing the mitigation activities identified in the Farm Environment Plan within the timeframes set out in the Farm Environment Plan.</u>"</p> <p>AND ensure Matters of Control section (found in earlier versions of PPC1) stays removed. If reinstated then AMEND Matters of Control so:</p> <ul style="list-style-type: none"> • (i) is retained • (ii) is deleted • (iii) is retained • (iv) is retained • (v) the term of the resource consent is specified, not left to Waikato Regional Council 	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports reasonable minimum standards for stock exclusion with the particular farm characteristics considered through the FEP and an assessment of critical source areas and identification of mitigations using MPA (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>FFNZ considers that conditions i, ii, iii, iv, vii and viii ought to be deleted.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>discretion</p> <ul style="list-style-type: none"> • (vi) is deleted and replaced with: "The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan will be <u>specified in the resource consent.</u>" • (vii) is deleted • (viii) is deleted <p>AND AMEND to reinstate Dates and Notification section from previous version of PPC1.</p>		
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5711	Rule 3.11.5.4	<p>REMOVE the use of OVERSEER or any other measuring tool in PPC1 until it is accurate both relatively and absolutely. (Rule 3.11.5.4) AND DELETE the use of benchmarking or allocation. AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives. AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves. AND research a series of mitigations with strong data to support their</p>	<p>Oppose in part</p> <p>Support in part</p>	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p> <p>FFNZ does not support any form of allocation, including grand parenting, for reasons including that there is no need to allocate and any consideration of allocation is premature.</p> <p>FFNZ considers BMP is too high a standard and</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>efficacy and help introduce them. These will in combination with pollution levies have the greatest and fastest effect on water pollution.</p> <p>Proportionality DELETE the use of a proportional system in PPC1 and REPLACE with pollution levies.</p> <p>Allocation REMOVE the use of allocations or benchmarking. AND AMEND to use pollution levies based on the outputs above the assimilative capacity of land. AND REPLACE the use of Overseer with a measuring system that works.</p> <p>Self Management DELETE the use of industry self management schemes.</p>		<p>that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that care is required with any prosecution approach because it considers there is significant uncertainty (including in measuring property discharges and the assumptions underlying targets). FFNZ considers that significant gains are likely to be made through farmers obtaining FEPs and that further gains can be made through education and industry support.</p> <p>FFNZ supports a proportionate approach for reasons including that it is reasonable to assess required mitigations based on, amongst other things (see FFNZ's submission on Variation 1), the contribution to the problem.</p> <p>FFNZ does not support pollution levies for reasons including that it is a "blunt" instrument, not sufficiently tailored, not suited for diffuse discharges (which are difficult to directly measure) and is likely to result in significant cost for no net benefit. The proposal to base them on the assimilative capacity of land has additional issues including that there is no reasonable proxy for the assimilative capacity of land and it would amount to an allocation approach (which FFNZ does not support).</p> <p>In principle, FFNZ supports the CIS as an</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.
South Waikato District Council Submitter ID: 72892	PC1-4216	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to provide an allocation approach with rules and performance standards to manage nutrient discharges and water quality and work with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes.	Support in part Oppose in part	FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ considers that discharges of contaminants from farming activities ought to be managed through tailored and proportionate FEPs. FFNZ agrees that the community ought to be engaged but considers the answer is through a range of interventions including whole of catchment action plans (provided they are non regulatory), tailored FEPs, consistency in approach across urban/rural and all sources of discharges, and as further explained in FFNZ's submission on Variation 1.
Stark, Steven and Theresa Submitter ID: 73721	PC1-5183	Rule 3.11.5.4	DELETE 3.11.5.4 iii and 3.11.5.4 iv. AND AMEND the term of a resource consent and/or Farm Environment Plan will be a minimum of 25 years.	Support in part	FFNZ considers that paragraphs i to iv, vii and viii ought to be deleted. Part of them ought to be incorporated into the conditions part of the rule (as opposed to matters of control) but FFNZ considers that WRC ought not to have control over things like the content of FEPs and timing or prioritisation of mitigations for reasons including that FEPs are prepared by certified farm environment planners and FFNZ refers further to its submission on Variation 1.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9358	Rule 3.11.5.4	RETAIN the 5 year rolling average if the Nitrogen Reference Point is retained OR DELETE from Rule 3.11.5.3 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any	Support in part Oppose in part	FFNZ supports the five year rolling average for the NRP for reasons including that it helps to smooth out unexpected events that might increase nitrogen e.g. drought (see FFNZ's submission on Variation 1). FFNZ supports the use of the NRP provided it is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>consequential amendments AND AMEND to include a measurement system that targets E.coli and phosphorous as a precursor for the whole Farm Environment Plan</p> <p>AND AMEND to include a stock exclusion measure that takes into account the length of waterway excluded, and/or the amount of fencing, and/or the area of planting, and /or the edge of field improvements and stock intensity</p> <p>AND AMEND so that once the stock exclusion and edge of field improvements are achieved an Overseer based program could be considered</p> <p>AND MAKE any other consequential amendments.</p>		<p>used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1. FFNZ considers that this is a better approach than adopting a measurement system for E coli and phosphorous for reasons including that these contaminants are not easily measureable and this may lead to an allocation approach which is likely to impose significant cost for no net benefit.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

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Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11811	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to relist items 4 and 5 to become a and b AND AMEND Matters of Control to read: "Waikato Regional Council... ii. The actions and timeframes for undertaking <u>implementing and putting in place</u> mitigation actions <u>identified in Farm Environment Plan that will maintain identified low levels of</u> , or reduce the diffuse... iii. The actions, timeframes and other... unless other suitable <u>and identified</u> mitigations are... vii. The timeframe and circumstance... Farm Environment Plan shall be amended... "	Oppose	FFNZ refers to the changes to Rule 4 and reasons for this set out in its submission on Variation 1, e.g. Council should not have control over actions and timeframes (as FEPs are prepared by a CFEP) and accordingly FFNZ does not agree with the proposed amendments to paragraphs ii and iii. FFNZ considers that sufficient flexibility is needed to respond to things like climatic events, economic downturn, animal welfare etc. It is concerned that Council is not in the business of farming, Council ought to have control certification of the planner not the content of the FEP or timing of actions.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8208	Rule 3.11.5.4	AMEND Rule 3.11.5.4 so that the permitted aspects are combined with Rule 3.11.5.3 AND AMEND to read as follows: " <u>Subject to Rule 3.11.5.6 and 3.11.5.7, except where the activity complies with as provided for in</u> Rule 3.11.5.1 and Rule 3.11.5.2 the use of land... is a permitted activity until <u>controlled activity from:...</u> " AND AMEND to ensure that activities that do not comply with Rules 3.11.5.1, 3.11.5.2 and 3.11.5.4 after the catchment dates are non-complying activities AND DELETE Rule 3.11.5.4(d) AND AMEND the matters of control in Rule 3.11.5.4 to reflect Policy 3 AND AMEND to ensure that any	Oppose	FFNZ supports retaining the permitted activity rule and the controlled activity rules as separate rules. In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. FFNZ opposes requiring rules that do not meet the permitted or controlled standards to be non-complying. This is for reasons including this is too high a threshold, is not reasonable, practical or affordable and will not reasonably provide for farming activities. FFNZ considers that paragraph d ought to refer to Schedule C as amended in FFNZ's submission on

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			increase in diffuse discharges of contaminants associated with commercial vegetable production is a non-complying activity AND DELETE references that provide for non-notification.		Variation 1. FFNZ considers that the matters of control ought to be significantly amended, including to remove Council control over the content of FEPs and timing of actions and refers to its submission on Variation 1. FFNZ considers that it is appropriate to provide for notification and therefore opposes the proposal to delete references to non notification.
Timberlands Limited Submitter ID: 73036	PC1-3435	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to read as: "Except as provided for.. is a permitted activity until: 1. 1 January 2020 for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value; 2. 1 January 2023 for properties or enterprises in Priority 2 sub-catchments listed in Table 3.11-2; 3. 1 January 2026 for properties or enterprises in Priority 3 sub-catchments listed in Table 3.11-2; <u>provided the property or enterprise complies with the region-wide good management practices for pastoral land use; ..."</u>	Support in part Oppose in part	In principle, FFNZ agrees that farming activities ought to comply with industry agreed GMP. However, FFNZ is concerned that requiring this as a permitted activity standard may result in a "one size fits all" approach. It considers that a better approach is to require these activities to obtain a simplified FEP as set out in FFNZ's submission on Variation 1. In principle, FFNZ supports an approach that requires the 75 th percentile to reduce but FFNZ considers that further consideration needs to be given to the appropriate spatial scale (e.g. the Upper Waikato FMU is too large and varied) and to how the NRP is calculated. FFNZ also considers that an appropriate consenting pathway ought to be provided where it is not possible to reduce. FFNZ refers further to its submission on Variation 1.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10503	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to relist items 4 and 5 to become a and b AND AMEND Matters of Control to read: "Waikato Regional Council..."	Oppose	FFNZ refers to the changes to Rule 4 and reasons for this set out in its submission on Variation 1, e.g. Council should not have control over actions and timeframes (as FEPs are prepared by a CFEP) and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>ii. The actions and timeframes for undertaking <u>implementing and putting in place</u> mitigation actions <u>identified in Farm Environment Plan</u> that <u>will</u> maintain <u>identified low levels of</u>, or reduce the diffuse...</p> <p>iii. The actions, timeframes and other... unless other suitable and <u>identified</u> mitigations are...</p> <p>vii. The timeframe and circumstance... Farm Environment Plan shall be amended..."</p>		<p>accordingly FFNZ does not agree with the proposed amendments to paragraphs ii and iii.</p> <p>FFNZ considers that sufficient flexibility is needed to respond to things like climatic events, economic downturn, animal welfare etc. It is concerned that Council is not in the business of farming, Council ought to have control certification of the planner not the content of the FEP or timing of actions.</p>
Waikato and Waipa Branches of the New Zealand Deer Farmers Association Submitter ID: 74008	PC1-9381	Rule 3.11.5.4	<p>AMEND Rule 3.11.5.4(5)(d) to read: "Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>according to a schedule of work as identified in a Farm Environment Plan...</u>"</p> <p>AND DELETE reference to the 75th percentile nitrogen leaching value AND AMEND to ensure that all land leaching above the sustainable level is required to reduce discharges over time and at a rate that is commensurate with their contribution to the total load and taking into account economic considerations AND AMEND to incorporate reference to the sustainable nitrogen leaching number by LUC class.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>While FFNZ agrees that the required works ought to be identified within a FEP, FFNZ considers that there are some reasonable minimum standards that ought to be contained in Schedule C and ought to apply to all farm activities (and a reasonable consenting pathway provided if they cannot comply e.g. Rule 6). FFNZ refers further to its submission on Variation 1.</p> <p>In principle, FFNZ supports an approach that requires the 75th percentile to reduce but FFNZ considers that further consideration needs to be given to the appropriate spatial scale (e.g. the Upper Waikato FMU is too large and varied) and to how the NRP is calculated. FFNZ also considers that an appropriate consenting pathway ought to be provided where it is not possible to reduce. FFNZ refers further to its submission on Variation 1.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ also considers that LUC class has no relationship or no reliable relationship with sustainable nitrogen leaching. FFNZ considers that a better approach is tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p>
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3524	Rule 3.11.5.4	<p>AMEND Rule 3.11.5.4 to relist items 4 and 5 to become a and b AND AMEND Matters of Control to read: "Waikato Regional Council...</p> <p>ii. The actions and timeframes for undertaking <u>implementing and putting in place</u> mitigation actions <u>identified in Farm Environment Plan that will maintain identified low levels of,</u> or reduce the diffuse...</p> <p>iii. The actions, timeframes and other... unless other suitable <u>and identified</u> mitigations are...</p> <p>vii. The timeframe and circumstance... Farm Environment Plan shall be amended..."</p>	Oppose	<p>FFNZ refers to the changes to Rule 4 and reasons for this set out in its submission on Variation 1, e.g. Council should not have control over actions and timeframes (as FEPs are prepared by a CFEP) and accordingly FFNZ does not agree with the proposed amendments to paragraphs ii and iii.</p> <p>FFNZ considers that sufficient flexibility is needed to respond to things like climatic events, economic downturn, animal welfare etc. It is concerned that Council is not in the business of farming, Council ought to have control certification of the planner not the content of the FEP or timing of actions.</p>
Waikato Dairy Leaders Group Submitter ID: 74049	PC1-11028	Rule 3.11.5.4	RETAIN the Rule 3.11.5.4 Controlled Activity status where farmers are assured of gaining consent, which will be subject to appropriate conditions	Support in part	FFNZ agrees that the controlled activity status ought to be retained for reasons including that FFNZ thinks that it is appropriate to provide farmers with the option of dealing with their industry body as

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND RETAIN the intent to require a Farm Environment Plan that is tailored to each individual farm AND AMEND to ensure Rule 3.11.5.4 has the same rigour of requirements as Rule 3.11.5.3, including the development, monitoring and enforcement of the Farm Environment Plan.		<p>a permitted activity or dealing with Council to have the certainty of a resource consent.</p> <p>FFNZ agrees that FEPs ought to be tailored to each individual farm. FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that Rules 3 and 4 ought to be consistent (including requiring the same rigour of requirements). FFNZ proposes significant amendments to the matters of control in its submission on Variation 1 for reasons including to ensure consistency with Rule 3 e.g. Council certifies a farm environment planner who prepares FEPs under both rules but Council does not have control over the content of FEPs under Rule 3 and FFNZ considers that likewise it should not have control over the content under Rule 4.</p>
Waikato Regional Council Submitter ID: 72890	PC1-3420	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1 AND AMEND Rule 3.11.5.4 to include a specific requirement that land users must farm such that when their farming activities are modelled in OVERSEER®, the Overseer nitrogen leaching loss does not exceed the Nitrogen Reference Point for the property AND AMEND to introduce provisions	Support in part Oppose in part	<p>FFNZ agrees that the dates ought to be extended and considers the submitter's proposal for 12 months after decisions has merit (although FFNZ considers some dates will need to be longer).</p> <p>FFNZ agrees that there ought to be a requirement in this rule that a farm enterprise does not exceed its NRP but only on the basis that those farm enterprises below the 75th percentile can increase nitrogen as a controlled activity (see FFNZ's submission on Variation 1, in particular rule 4A) and those above the 75th percentile can maintain their nitrogen discharge if consent is obtained as a RD activity (see FFNZ's submission on Variation 1, in</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>throughout PPC1 to enable the reassignment of Nitrogen Reference Point entitlements between properties when new land is incorporated into a property AND DELETE all references in PPC1 to the '5 year rolling average' (Rule 3.11.5.4 and Schedule 1) AND MAKE any consequential amendments to delete the definition in the Glossary in Part C AND AMEND to use the Nitrogen Reference Point as a yardstick to indicate the relative amount of nitrogen being lost from a property AND AMEND Rule 3.11.5.4(iii) to read: "The actions, timeframes and other...the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified." OR alternatively AMEND Rule 3.11.5.4(iii) and Schedule 1 to provide more clarity regarding how the discretion available in this provision, should be exercised AND AMEND Rule 3.11.5.4(5) to require compliance with the Nitrogen Reference Point in the period during which the property owner is permitted under this rule AND AMEND to require compliance with Schedule B AND AMEND Rule 3.11.5.4 and</p>		<p>particular Rule 6).</p> <p>FFNZ supports the ability to re-assign NRPs but considers that there also needs to be the ability to obtain an entirely new NRP as a result of things like subdivision, acquisition of additional land etc.</p> <p>FFNZ supports the five year rolling average for the NRP for reasons including that it helps to smooth out unexpected events that might increase nitrogen e.g. drought (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ opposes the deletion of the words "unless other suitable mitigations are specified." FFNZ considers that alternatives ought to be provided.</p> <p>In principle, FFNZ supports a requirement to maintain the NRP but considers that a reasonable pathway needs to be provided for increases in nitrogen and that matters regarding overseer need to be addressed e.g. version change, alternative models, mitigations outside Overseer, changes in</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Schedule B to delete the ability for an enterprise to hold a Nitrogen Reference Point and restrict the Nitrogen Reference Point to exist only in association with a particular parcel or property</p> <p>AND AMEND Rule 3.11.5.4 to provide for a more refined staging of resource consent applications over each of the three year period in each priority order but remain with the priority order in Table 3.11-2</p> <p>AND AMEND Rule 3.11.5.4(5)(c) to read: "A Nitrogen Reference Point has been produced for the property or enterprise in conformance to <u>comply</u> with Schedule B and is has <u>been</u> provided to the Waikato Regional Council at the time the resource consent application is lodged.."</p> <p>AND AMEND Rule 3.11.5.4(4) to add a new item to read: "<u>The use of land for farming activities complies with Schedule C.</u>"</p> <p>AND AMEND Rule 3.11.5.4(5)(d) to read: "<u>The use of land for farming activities</u>scattle, horses, deer and pigs are excluded from water bodies in conformance with<u>complies</u> with Schedule C."</p> <p>AND AMEND Rule 3.11.5.4 to re-number 4 and 5 to become a. and b. and remove the indent on the paragraph starting with 'after the</p>		<p>input standards/assumptions, five year rolling average (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that compliance with the NRP should only be a requirement as a condition of the rule and not prior to application for resource consent.</p> <p>FFNZ considers that flexibility ought to be provided to enable a property or an enterprise to hold an NRP and refers to its submission on Variation 1.</p> <p>FFNZ supports the staging of consent applications but considers that a longer period than three years may be required and that the dates ought to be amended in light of the two year delay following notification of PC1 (see FFNZ's submission on Variation 1).</p> <p>FFNZ would support the amendment to Rule 4(4) and Rule 4(5)(d) provided that Schedule C is amended as proposed in FFNZ's submission on Variation 1, including to ensure it contains all reasonable minimum standards.</p> <p>However, FFNZ considers that significant other amendments (including to the matters of control) are required as set out in its submission on Variation 1.</p>

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			dates...'		
Waipa District Council Submitter ID: 67704	PC1-3170	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules. AND ADD in Rule 3.11.5.4 additional matters of control, standards and terms and matters of discretion providing for offset mitigation, generally as outlined in Policy 11. The matters should specify the offset: - is for the same contaminant - occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit - remains in place for the duration of the consent and is secured by consent condition	Support in part	FFNZ agrees that amendments are required to clearly explain how things like subdivision and changes to farm enterprise structure or property ownership are deal with. FFNZ proposes in its submission on Variation 1 that subdivision could be dealt with by a new paragraph f for Rule 4 requiring a new NRP for the lots created by the subdivision. FFNZ supports offsetting and the provision for offsetting in Policy 11 (as amended by FFNZ's submission on Variation 1). However, it considers that care with the matters of control is required and considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11374	Rule 3.11.5.4	AMEND Rule 3.11.5.4 to read: "Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) where the land is not registered to a relevant Certified Industry Scheme... is a permitted activity until <u>the point in time or event (whichever occurs first) specified below:</u> <u>1. Resource consent is granted to an enterprise for sub-catchment land use change and farming activities and associated diffuse discharges in conformance with Policy 6(c):"</u> AND AMEND to renumber the	Oppose	FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate. FFNZ does not support the proposal to grant sub-catchment collective. FFNZ agrees that if consent is granted under a different rule (e.g. consent for land use change) consent should not be required under Rule 4.

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			subsequent points accordingly.		
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2142	Rule 3.11.5.4	AMEND Rule 3.11.5.4 the implementation date for Farm Environment Plans for all sub-catchments to 1st July 2020. AND DELETE reference to the 75th percentile nitrogen leaching value.	Oppose	<p>FFNZ considers that a prioritised approach ought to be adopted for reasons including that there are unlikely to be sufficient CFEPs to carry out all FEPs by 2020 (or any date as amended by Variation 1 or other submissions) and targeted and prioritised hot spot approach is more likely to result in the greatest water quality improvements for the lowest cost.</p> <p>In principle, FFNZ supports an approach that requires the 75th percentile to reduce but FFNZ considers that further consideration needs to be given to the appropriate spatial scale (e.g. the Upper Waikato FMU is too large and varied) and to how the NRP is calculated. FFNZ refers further to its submission on Variation 1.</p>
Waitomo Catchment Trust Board Submitter ID: 73124	PC1-7953	Rule 3.11.5.4	AMEND PPC1 to ensure that all discharges to contact recreation streams are considered as point source discharges [inputs] and monitored as such on a case-by-case basis. AND AMEND PPC1 so that grazing adjacent to waterways and on steep contour is at least a controlled activity, and a restricted discretionary activity where necessary. AND AMEND PPC1 to promote edge of field mitigation on farms bordering contact recreation streams. AND AMEND PPC1 to ensure that robust, regular monitoring is mandatory where consented activities take place.	Oppose	<p>FFNZ does not consider it appropriate to deem diffuse discharges to be point source discharges if they occur near or feed into contact recreation streams for reasons including that they are fundamentally different e.g. they cannot be easily measured or observed and cannot easily be stopped or changed e.g. there is no “off” switch.</p> <p>FFNZ does not support a blanket approach or unreasonable minimum standards, such as a requirement that all land adjacent to waterways and on steep contour is a controlled activity. FFNZ considers that the appropriate approach is consider critical source areas through tailored FEPs and this can occur with the permitted or controlled activities (see FFNZ’s submission on Variation 1).</p> <p>FFNZ considers that edge of field mitigations ought to be non-regulatory (e.g. through sub-catchment</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>management plans as proposed in FFNZ's submission) but that where edge of field works are undertaken those works are taken into account when assessing the works required in the FEP.</p> <p>In principle FFNZ supports monitoring but considers that it ought to reflect the nature of the circumstances e.g. farming needs to be flexible to respond to things like floods or health and safety and therefore detailed mitigations in FEPs ought to not become enforceable conditions of consent (see FFNZ's submission on Variation 1).</p>
Waitomo District Council Submitter ID: 73688	PC1-10332	Rule 3.11.5.4	<p>AMEND Rule 3.11.5.4 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance AND AMEND to include additional matters of control, standards and terms and matters of discretion providing for offset mitigation, generally as outlined in Policy 11. The matters should specify the offset: is for the same contaminant; occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit; and remains in place for the duration of the consent and is secured by consent condition</p> <p>AND AMEND in Rule 3.11.5.4 the provisions that specifying the Nitrogen Reference Point be calculated and not exceeded, and instead use the Nitrogen Reference Point as part of a Farm Environment</p>	Support in part	<p>FFNZ agrees that amendments are required to clearly explain how things like subdivision and changes to farm enterprise structure or property ownership are dealt with. FFNZ proposes in its submission on Variation 1 that subdivision could be dealt with by a new paragraph f for Rule 4 requiring a new NRP for the lots created by the subdivision.</p> <p>FFNZ supports offsetting and the provision for offsetting in Policy 11 (as amended by FFNZ's submission on Variation 1). However, it considers that care with the matters of control is required and considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data</p>

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			Plan to inform mitigation measures.		instead of defaults. FFNZ considers that the proposal that the NRP is part of the FEP to inform mitigation measures has merit because it would address issues regarding enforceability of an Overseer number. However, FFNZ considers that further consideration and/or care is required to ensure that detailed mitigations in FEPs do not become conditions of consent because flexibility is required for farming to respond to things like floods and drought (see FFNZ's submission on Variation 1).
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-9515	Rule 3.11.5.5	AMEND Rule 3.11.5.5 Matters of Control iii. to provide for exceptions to the maintaining or reductions of contaminants and exceedances of the Nitrogen Reference Point in the case of low level discharges not required to be reduced. AND CONSIDER supporting programmes that support the retirement of vulnerable areas.	Support in part Oppose in part	FFNZ would support in principle non regulatory programmes (including funding) for retirement of steep and erosion prone land. However, FFNZ considers that this is not suitable as a regulatory approach or requirement.
Aston, Lucy Submitter ID: 73020	PC1-7121	Rule 3.11.5.5	DELETE the Nitrogen Reference Point requirements from PPC1 AND, if the Nitrogen Reference Point requirements are not deleted, AMEND PPC1 so that the OVERSEER Model is not solely relied on but is used as part of a range of measurement tools AND AMEND PPC1 so that where Overseer is used that the Best Management Practices are applied including input standards and	Support in part Oppose in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance. FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed

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			<p>protocols, applying actual farm specific information and reducing use of standardised input parameters AND REMOVE the requirement for operations at or under 18 stock units, and sheep and beef farmers to have to manage to a Nitrogen Reference Point AND AMEND PPC1 to adopt a sub-catchment approach to addressing contaminants that are relevant to each farm and water body AND AMEND PPC1 so that where nitrogen discharges from a property have to be allocated then the allocation system is based on the natural capital of soils and the water quality outcomes that are to be achieved for each sub-catchment, not on the 2014/15 or 2015/16 land use or grandparenting approach AND AMEND PPC1 so that Farm Environment Plans are used to determine what would work best on each farm AND AMEND the Farm Environment Plan requirements so they are only required in sub-catchments where science indicates improvements are required AND AMEND PPC1 so that for Farm Environment Plans an independent panel is available to ensure accountability and enable contested points to be settled without appeals to</p>		<p>GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ also considers that there is no reliable alternative measure of natural capital. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation</p>

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			<p>the Environment Court AND AMEND the stock exclusion provisions of PPC1 to the standards recommended in the Clean Water Report (February 2017) AND AMEND the stock exclusion provisions of PPC1 so fencing is required above 15 degree slope for farming operations greater than 18su/ha AND AMEND PPC1 so mitigations are set on a farm by farm basis, focused on management of clearly identified and measurable 'critical source management areas' AND AMEND PPC1 so the rules are focused on reducing impacts from intensive agriculture greater than 18su/ha rather than applying blanket rules to all extensive agriculture AND AMEND the Farm Environment Plan requirements so they are produced by the landowner with Waikato Regional Council guidance and support AND DELETE point 5(a) from Schedule 1 AND AMEND PPC1 so that there is flexibility in nitrogen leaching from hill country sheep and beef farming, and land uses which are low impact (at or below 20kgN/ha/yr for example or apply natural capital allocation) AND AMEND the timeframes to prepare Farm Environment Plans so</p>		<p>setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP.</p> <p>FFNZ considers that the timeframes need to be amended to recognise the 2 year delay since notification of PC1 and ought to be reasonable.</p>

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			they are set through consultation with the farmer taking into account the Waikato Regional Council subsidy available; the individual farmer's financial constraints; and the sensitivity of the waterbody to any impact.		
A S Wilcox & Sons Ltd Submitter ID: 73142	PC1-4318	Rule 3.11.5.5	RETAIN Rule 3.11.5.5	Support in part Oppose in part	FFNZ considers that Rule 5 ought to be retained to provide a reasonable controlled activity pathway for commercial vegetable growing. However, FFNZ considers that amendments are required as set out in its submission on Variation 1, including to substantively amend the matters of control. FFNZ also considers that a new controlled activity rule ought to be adopted to provide for the transfer of commercial vegetable production activity or something similar to provide for crop rotation (see FFNZ's submission on Variation 1).
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11000	Rule 3.11.5.5	AMEND Rule 3.11.5.5 to read: "The use of land for commercial vegetable production and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water, is a permitted activity until 1 January 2020, from which date it shall be a controlled activity (requiring resource consent) subject to provided the following standards and terms <u>are complied with</u> : ... d. The land use is registered to a	Oppose	FFNZ considers that Rule 5 ought to be amended as set out in its submission on Variation 1, including to substantively amend the matters of control. FFNZ considers that a commercial vegetable grower ought to have the option of registering with a CIS as a permitted activity or as obtaining a controlled consent, just like other farming activities. FFNZ does not support allocation or the 80 year targets and does not support the targets and timeframes proposed by the submitter in schedule E. Therefore, FFNZ opposes references to these or a requirement to comply with these. FFNZ does not support Council having control over

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Certified Industry Scheme; and ... h. A Farm Environment Plan for the property or enterprise prepared in conformance with Schedule 1 and approved by a Certified Farm Environment Planner is provided to the Waikato Regional Council at the time as part of the resource consent application is lodged. i. <u>Nitrogen discharge from the properties meets the targets and timeframes set out in Schedule E, as assessed by the Regional Council under the methodology contained in Schedule B (including Updated Nitrogen Leaching Assessments).</u> Matters of Control: Waikato Regional Council reserves control over the following matters: i. The content of the Farm Environment Plans <u>which in any event must be in accordance with Schedule 1.</u> i1. <u>Buffers, as specified in Schedule D.</u> ... iv. The actions and timeframes to ensure the diffuse discharge of nitrogen does not increase beyond the property or enterprises Nitrogen Reference Point is reduced to or maintained at a level specified in <u>Schedule E or any operative nitrogen trading scheme.</u></p>		<p>FEPs (on the basis that Council certifies farm environment planners and for the reasons set out in FFNZ's submission on Variation 1) and therefore opposes the amendments to the matters of control as proposed by this submitter.</p> <p>FFNZ considers that confidential and private information should not be publicly available. It considers that further thought needs to be given to what information will be made public, the purpose of the information and how it will be used.</p> <p>FFNZ does not support reviews of resource consents for reasons other than what is reasonably provided for in the RMA. FFNZ's concerns with the submitter's proposal include that uncertainty around reviews and length of consents and changes would create significant uncertainty for farmers and have flow on adverse economic and social effects and adverse implications for investment in mitigations.</p>

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			<p>... vi. The monitoring, record keeping, reporting and information provision, <u>including public information provision</u>, requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</p> <p>... viii. Procedures for reviewing, amending and re-certifying re-approving the Farm Environment Plan <u>the resource consent including:</u> a) <u>Periodic reviews in accordance with the sub-catchment review timeframes as specified in Table 3.11-2</u> b) <u>Reviews, initiated by the consent holders under section 128 on the purchase or sale of any nitrogen discharge rights under any operative catchment nitrogen trading scheme, in order to change the level of discharge authorised by this consent in clause iii.</u> Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons. <u>Reviews will be subject to limited or public notification based on progress against the sub-catchment review targets and timeframes specified in Table 3.11-2."</u></p>		
Bailey, James	PC1-9047	Rule 3.11.5.5	DELETE the Rule	Support in	FFNZ supports the use of the NRP provided it is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73926			3.11.5.5 requirement to manage property level discharges to a Nitrogen Reference Point based on historic profiles AND AMEND PPC1 to apply Land Use Suitability and Natural Capital now by including allocation based on the Natural Capital of soils through a Land Use Capability approach AND AMEND to provide a flexibility cap for low leaching farm systems below a certain threshold (20kg/N/ha/yr) that is deemed as a sustainable level for the transition period, with farmers with a Nitrogen Reference Point below this enabled to increase up to this point.	part Oppose in part	used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance. FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit. FFNZ considers that discharges of contaminants from farming activities ought to be managed through tailored and proportionate FEPS. FFNZ considers that there is insufficient information or proxy or reliable basis to manage nitrogen on the basis of natural capital. FFNZ supports flexibility for low nitrogen emitters to increase and refers to the changes it proposes for Rule 2 in its submission on Variation 1.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6914	Rule 3.11.5.5	AMEND Rule 3.11.5.5 to make it clear at what point the rule will trigger the need for resource consent. AND MAKE any similar amendments to like effect or any consequential	Support in part	FFNZ considers that Rule 5 is clear that resource consent is required and for what activity it is required. However, to the extent that there are any ambiguities FFNZ would support amendment to the rule (and FFNZ refers to its submission on Variation

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			amendments that stem from the relief sought.		1 which sets out how it thinks Rule 5 and 5A ought to be amended).
Balle Bros Group Submitter ID: 67834	PC1-11426	Rule 3.11.5.5	<p>AMEND Rule 3.11.5.5 to read: '...a. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</p> <p>b. "A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and provided to the Waikato Regional Council at the time the resource consent application is lodged; and"</p> <p>...</p> <p>e. "The areas of land, and their locations broken down by sub-catchments [refer to Table 3.11-2], that were used for commercial vegetable production within the property or enterprise each year in the period 1 July 2006 to 30 June 2016, together with the maximum area of land used for commercial vegetable production within that period, shall be provided to the council; and</p> <p>f. The total area of land for which consent is sought for commercial vegetable production must not exceed the maximum land area of the property or enterprise that was used for commercial vegetable production during the period 1 July 2006 to 30 June 2016; and</p> <p>g. Where now land is proposed to be</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that Rule 5 ought to be retained to provide a reasonable controlled activity pathway for commercial vegetable growing. However, FFNZ considers that amendments are required as set out in its submission on Variation 1, including to substantively amend the matters of control.</p> <p>FFNZ also considers that a new controlled activity rule ought to be adopted to provide for the transfer of commercial vegetable production activity or something similar to provide for crop rotation (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that paragraphs b, e, f and g ought to be retained but only on the basis that the NRP is a reference point and the other amendments to policies and rules set out in FFNZ's submission are made to provide a reasonable pathway for commercial vegetable production and things like crop rotation. (FFNZ would support their removal if the other changes proposed in FFNZ's submission on Variation 1 were not made).</p> <p>FFNZ considers that significant changes are required to the matters of control (including to move some matters into the standards of the rule and to remove Council control over FEPs) as set out in its submission on Variation 1. FFNZ agrees with this submitter that paragraphs ii and iv ought to be deleted.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>used for commercial vegetable production, an equivalent area of land must be removed from commercial vegetable production in order to comply with standard and term f; and"</p> <p>...</p> <p>Matters of control</p> <p>...</p> <p>ii. "The maximum area of land to be used for commercial vegetable production".</p> <p>...</p> <p>"iv. The actions and timeframes to ensure that the diffuse discharge of nitrogen does not increase beyond the Nitrogen Reference Point for the property or enterprise." ...'</p>		
Charion Investment Trust Submitter ID: 71344	PC1-7794	Rule 3.11.5.5	<p>Rule 3.11.5.5: DELETE all the rules and schedules as appropriate to remove provisions for land use consent terms and conditions. AND RETAIN the ruse of rules for the control and reduction of nitrogen, phosphorous, sediment and microbial pathogens.</p>	Oppose in part	<p>FFNZ considers that a reasonable consenting framework needs to be provided and considers this can be achieved through the consenting framework proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that the rules need to be hybrid land use and discharge rules due to the nature of diffuse discharges e.g. they cannot be directly measured.</p>
Chhagn Bros Co Ltd Submitter ID: 73762	PC1-5594	Rule 3.11.5.5	RETAIN Rule 3.11.5.5.	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that Rule 5 ought to be retained to provide a reasonable controlled activity pathway for commercial vegetable growing. However, FFNZ considers that amendments are required as set out in its submission on Variation 1, including to substantively amend the matters of control.</p> <p>FFNZ also considers that a new controlled activity rule ought to be adopted to provide for the transfer</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					of commercial vegetable production activity or something similar to provide for crop rotation (see FFNZ's submission on Variation 1).
Cotman, Jim Submitter ID: 59884	PC1-4590	Rule 3.11.5.5	<p>WITHDRAW PPC1 AND REPLACE with a new plan that endorses 'Best Practical Options' that are developed by landowners.</p> <p>AND AMEND to provide new plan that supports the development and implementation of Catchment Management Plans that are led by landowners.</p> <p>AND ENSURE this new plan supports identifying potential critical source contaminant pathways on a sub-catchment basis to provide quantifiable measures and factual information into Catchment Management Plans.</p> <p>AND ENSURE the new plan encourages innovative new science that provide alternative means to managing water quality.</p> <p>AND ENSURE the new plan recognises that well informed landowners as stewards of their land are the best and only people who can create action on the ground.</p> <p>AND ENSURE the new plan approach favours a 'shared values' approach where all parties work toward achieving sensible water quality targets.</p> <p>AND ENSURE that the primary focus of the new plan is a comprehensive</p>	Support in part	<p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate. FFNZ agrees that robust science and information is required over the lifetime of this plan.</p> <p>FFNZ agrees that landowners ought to be involved in the preparation of FEPs and in the development of mitigations.</p> <p>FFNZ considers that a rules framework is needed but that this ought to provide a reasonable consenting or permitted activity pathway as proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that koi carp need to be addressed and that the focus ought to be on all sources of contaminants, not just diffuse discharges from farming activities.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			programme to eliminate Koi Carp along with the native species predator, catfish.		
Farmers 4 Positive Change (F4PC) Submitter ID: 73355	PC1-10431	Rule 3.11.5.5	AMEND Rule 3.11.5.5 to use Farm Environment Plans as a tool to understand land use suitability and manage contaminant loss AND AMEND to include a range of actions in Farm Environment Plans, such as avoid farming older cattle on slopes in winter or when wet; farm cattle extensively on slopes; fence off swamps and plant out to provide silt traps to remove sediment; construct sediment traps near the headwaters to help slow flow and trap sediment; plant shade trees away from waterways to discourage stock camps and nutrient build-up; use temporary electric fencing where and when necessary; plant poplar poles on erosion prone slopes; identify suitable units for planting pines at farmer discretion; fence off waterways on more intensively farmed areas of the farm and provide reticulated water for stock.	Support in part Oppose in part	FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1. FFNZ has concerns about the submitter's proposal to use FEPS to understand land use suitability and would oppose such a proposal if it involved allocating contaminants or was used in a regulatory context to require land use change or specify what activities could occur. FFNZ considers that FEPs ought to be sufficiently flexible to consider a range of mitigations (guided by FFNZ's MPA framework) and if the suggestion is to list the potential mitigations FFNZ would oppose such an approach because it considers that there needs to be sufficient flexibility and tailoring to the specific situation.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10628	Rule 3.11.5.5	DELETE Rule 3.11.5.5(f) and (g) AND DELETE Matter of Control (ii).	Support in part Oppose in part	FFNZ considers that Rule 5 ought to be retained to provide a reasonable controlled activity pathway for commercial vegetable growing. However, FFNZ considers that amendments are required as set out in its submission on Variation 1, including to substantively amend the matters of control. FFNZ also considers that a new controlled activity

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>rule ought to be adopted to provide for the transfer of commercial vegetable production activity or something similar to provide for crop rotation (see FFNZ's submission on Variation 1).</p> <p>In the context of these changes, FFNZ considers that paragraphs f and g ought to be retained (but would support their removal if the other changes proposed in FFNZ's submission on Variation 1 were not made).</p> <p>FFNZ agrees that condition ii ought to be deleted and considers that the matters of control require significant amendment as set out in its submission on Variation 1.</p>
<p>Fonterra Co-operative Group Ltd Submitter ID: 74057</p>	<p>PC1-10505</p>	<p>Rule 3.11.5.5</p>	<p>AMEND Rule 3.11.5.5 by separating the permitted and controlled parts of Rule 3.11.5.5 into two rules with the permitted activity rule making commercial vegetable production prior to 1 January 2020 a permitted activity subject to conditions that ensure that there is no expansion of the aggregate land area devoted to that use prior to that date. AND within the controlled activity rule, AMEND conditions f. and g. to read: "...f. the total area of land for which consent is sought for commercial vegetable production must not exceed the maximum land area of the property or enterprise that was used for commercial vegetable production in any single year during the period 1</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports providing for commercial vegetable production as a permitted activity until Rule 5 comes into effect but considers the date needs to be extended (particularly in light of the two year delay since PC1 was notified). FFNZ considers that there should be no requirement not to expand but that any expansion post notification of PC1 would require consent.</p> <p>FFNZ also considers that a permitted activity alternative (through a CIS like that provided for farming activity) ought to be provided.</p> <p>FFNZ is concerned that the proposed amendment to paragraph f will unreasonably restrict commercial vegetable growing and therefore opposes the change.</p> <p>FFNZ agrees that the proposed change to paragraph g would provide greater clarity about the</p>

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			July 2006 to 20 June 2016; and g. where any new land is proposed to be used for commercial vegetable production <u>that has not been previously used for commercial vegetable production during the 1 July 2006 to 30 June 2026 period</u> , an equivalent area of land must be removed from commercial vegetable production in order to comply with standard and term f; and..."		application of the rule.
Glenshee Trust Submitter ID: 73028	PC1-1874	Rule 3.11.5.5	AMEND 3.11.5.5 if the use of the Nitrogen Reference Point is continued, consider using long term averaging of nitrogen losses. This provides more ability to cope with yearly changes that frequently occur within biological systems AND AMEND by giving further consideration to alternative tools such as the use of the natural capital approach AND AMEND by utilising tools such as Farm Menus developed by Waikato Regional Council as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model AND AMEND where Overseer is to be used as part of the creation of solutions then the calculations must be used as a guide only and the focus to be on the trends used	Support in part Oppose in part	FFNZ considers that the NRP ought to be calculated on a five year rolling average for reasons including that flexibility is needed e.g. during drought which may increase nitrogen if stock are not able to be sold (see FFNZ's submission on Variation 1). In principle, FFNZ acknowledges that LUC could be used as a on farm decision support tool used as one of a range of tools to help identify critical source areas and assess mitigations. However, FFNZ considers that it is not a proxy for nitrogen or a basis for allocation and considers that there is no suitable proxy for "natural capital." FFNZ considers that a more appropriate way to manage nitrogen (and other contaminants) is through tailored and proportionate FEPs with critical source areas identified and mitigations assessed using FFNZ's MPA framework (FFNZ refers further to its submission on Variation 1). FFNZ supports a "farm menu" type approach and considers that its MPA framework provides for a similar assessment.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND Rule 3.11.5.5 Farm Environment Plan provisions by providing an industry wide capability assessment to assess who will complete Farm Environment Plans AND AMEND Farm Environment Plan provisions to showing land owners and the industry how these are to be constructed and how the gains are quantified AND AMEND by providing clarity as to how the monitoring of Farm Environment Plans will be undertaken and who will pay for this before land owners commitment to this.</p>		<p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ agrees that there will likely be a shortage in CFEPs and considers that provision for that e.g. industry wide capability, ought to be provided for.</p> <p>FFNZ is concerned that by amending the FEP provisions to show landowners and industry how they can be constructed will result in them becoming too rigid and not sufficiently tailored. FFNZ considers that this could be addressed through guidance documents provided they were sufficiently flexible.</p>
Greenlea Premier Meats Ltd Submitter ID:	PC1-7547	Rule 3.11.5.5	DELETE requirements for land use activities to not exceed their historic nitrogen discharge levels when below	Support in part	FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
72144			20kgN/ha/yr. AND AMEND to enable low leaching and land uses (below 20kgN/ha/yr) to increase discharges up to 20kgN/ha/yr. AND AMEND by basing the nitrogen allocation system on the natural capital of soils taking into consideration the assimilative capacity of freshwater.	Oppose in part	<p>provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ also supports the ability for low nitrogen discharges to increase and refers to its submission on Variation 1 (particularly Rule 2). It is concerned that a threshold of 20kgN may be too high but would support it if it was supported by a robust section 32 assessment.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ also considers that there is no reliable proxy for natural capital and that it is not appropriate to allocate on this basis.</p>
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5780	Rule 3.11.5.5	AMEND Rule 3.11.5.5 to reflect the approach described in this submission on the farming rules.	Oppose	FFNZ does not support the amendments proposed by this submitter to the rules and refers to the reasons set out above. In particular, FFNZ does not support a BPO approach based on input controls and is concerned that this will likely impose significant cost for no net benefit.
Horticulture New Zealand (HortNZ) Submitter ID:	PC1-10117	Rule 3.11.5.5	AMEND Rule 3.11.5.5 to read: "3.11.5.5 Controlled Activity Rule - <u>Discharge of contaminants from</u>	Support in part	In principle, FFNZ supports retaining the diffuse discharge rules (save for the new Rule 5A proposed in FFNZ's submission on Variation 1) as hybrid land

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73801			<p>existing commercial vegetable production/Te Ture mō ngā Mahi ka āta Whakahaerehia- Te whakatupu hua whenua ā-arumoni o te wa nei</p> <p>The use of land for commercial vegetable production and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land <u>from commercial vegetable production</u> in circumstances which may result in those contaminants entering water, is a permitted activity until 1 January 2020, from which date it shall be a controlled activity (requiring resource consent) subject to the following standards and terms:</p> <p>a. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</p> <p>b. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and provided to the Waikato Regional Council at the time the resource consent application is lodged:</p> <p><u>i. in conformance with Schedule B; or</u></p> <p><u>ii. Through use of a proxy farm system;</u></p> <p><u>to approximate the nitrogen reference, is produced for the property, enterprise or catchment collective and provided to the Waikato Regional Council at the time</u></p>	Oppose in part	<p>use and discharge rules for reasons including that the nature of diffuse discharges is different from point source (e.g. it cannot be observed or easily measured and cannot be easily controlled) and for the reasons set out in its submission on Variation 1. FFNZ therefore considers that the start of the rule ought to refer to “the use of land ...”</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ agrees with amendments to provide for the use of alternative models to Overseer.</p> <p>FFNZ considers that it is appropriate and necessary for the rule to refer to the 10 year period from 2006 and 2016 therefore opposes amendments to remove this reference.</p> <p>FFNZ supports the amendments to paragraph f if this provides greater flexibility and clarity as well as lower cost.</p> <p>FFNZ agrees that it would make sense for the CFEP to be qualified and experienced in the context of commercial vegetable growing.</p> <p>FFNZ agrees that consents ought to be granted for at least 15 years and refers to the amendments to</p>

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			<p><u>the resource consent application is lodged</u>; and</p> <p>c. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and</p> <p>d. The land use is registered to a Certified Industry Scheme; and</p> <p>e. The areas of land, and their locations broken down by sub-catchments [refer to Table 3.11-2], that were <u>are</u> used for commercial vegetable production within the property or enterprise each year in the period 1 July 2006 to 30 June 2016, together with the maximum area of land used for commercial vegetable production within <u>the period 1 July 2006 to 30 June 2016</u> that period, shall be provided to the Council; and</p> <p>f. The total area of land <u>across all sub-catchments grown in</u> for which consent is sought for commercial vegetable production must not exceed the maximum land area of the property or enterprise that was used for commercial vegetable production during the period 1 July 2006 to 30 June 2016; and</p> <p>...</p> <p>h. A Farm Environment Plan for the property or enterprise prepared in conformance with Schedule 1<u>B</u> and approved by a Certified Farm Environment Planner (<u>commercial</u></p>		<p>the policies and rules in FFNZ's submission Variation 1.</p> <p>As set out in FFNZ's submission on Variation, FFNZ considers that significant amendments are required to the matters of control.</p>

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			<p><u>vegetable crops</u>) is provided to the Waikato Regional Council at the time the resource consent application is lodged.</p> <p>Matters of Control Waikato Regional Council reserves control over the following matters:</p> <p>...</p> <p>iv. The actions and timeframes to ensure that the diffuse discharge of nitrogen from activities existing prior to 2016 do not increase beyond the Nitrogen Reference Point for the property or enterprise.</p> <p>...</p> <p>Advisory notes: Under section 20A(2) of the RMA a consent must be applied for within 6 months of 1 January 2020, namely by 1 July 2020. <u>Consents will generally be granted for a term not less than 15 years."</u></p>		
Jivan Produce Ltd Submitter ID: 71429	PC1-1359	Rule 3.11.5.5	<p>AMEND to ensure for Rule 3.11.5.5 that consent duration provides future certainty for commercial vegetable growers future business planning and to move land around the catchment.</p> <p>AND DELETE capping of land and instead reflect management of land use on a sub-catchment basis.</p> <p>AND AMEND to enable land use change where attribute targets for a sub-catchment are met.</p> <p>AND ADD a NEW Restricted</p>	Support in part	<p>FFNZ agrees that the consent duration ought to provide certainty and incentivise investment in mitigations and the business.</p> <p>FFNZ agrees that reasonable flexibility ought to be provided for the expansion of commercial vegetable growing but considers that this is better addressed through amendments to Rule 7 as opposed to Rule 5 (and FFNZ refers to its submission on Variation 1, in particular the changes to the policy and rule framework).</p> <p>FFNZ considers that land use change ought to be</p>

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			<p>Discretionary Consent to manage land use change in sub-catchment's that do not meet attribute targets. AND CLARIFY how land will be moved and retired within the catchment under the proposed consent.</p> <p>AND AMEND to provide clarification on how the Nitrogen Reference Point will work with leased land.</p> <p>AND CLARIFY whether retired land will be allocated a residual nitrogen value.</p> <p>AND REMOVE the requirement for a Nitrogen Reference Point in Commercial Vegetable Production systems from Policy 2, unless a viable alternative to the OVERSEER Model can be verified.</p>		<p>provided for as a discretionary activity but would support a RD activity if it was supported by a robust section 32 assessment.</p> <p>FFNZ considers that a new Rule 5A is required to address crop rotation and that amendments to Rules 5 and 5A are required to address matters such as what happens to land once commercial vegetable production moves to another location.</p> <p>FFNZ agrees that clarification is required about how the NRP will operate for leased land and refers to its submission on Variation 1.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults. FFNZ agrees that an alternative to Overseer for commercial vegetable production ought to be provided.</p>
Matamata-Piako District Council Submitter ID: 73419	PC1-3702	Rule 3.11.5.5	<p>With respect to Rule 3.11.5.5, work with the sector groups to review the reasons for the adoption of this set of reporting performance conditions and standards as a controlled activity.</p> <p>OR</p> <p>AMEND to ensure that the current approach meets the section 32 efficiency and effectiveness tests.</p>	Support in part	<p>FFNZ agrees that further consideration is needed in respect of Rule 5. FFNZ supports stakeholders and affected parties working together to address this.</p> <p>FFNZ considers that Rule 5 ought to be retained to provide a reasonable controlled activity pathway for commercial vegetable growing. However, FFNZ considers that amendments are required as set out in its submission on Variation 1, including to substantively amend the matters of control.</p> <p>FFNZ also considers that a new controlled activity</p>

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					rule ought to be adopted to provide for the transfer of commercial vegetable production activity or something similar to provide for crop rotation (see FFNZ's submission on Variation 1).
Matira Sub Catchment Group Submitter ID: 74148	PC1-9298	Rule 3.11.5.5	DELETE Rule 3.11.5.5 in its entirety OR AMEND to provide a land use suitability and a sub-catchment method that would work better.	Oppose	<p>FFNZ considers that Rule 5 ought to be retained to provide a reasonable controlled activity pathway for commercial vegetable growing. However, FFNZ considers that amendments are required as set out in its submission on Variation 1, including to substantively amend the matters of control.</p> <p>FFNZ also considers that a new controlled activity rule ought to be adopted to provide for the transfer of commercial vegetable production activity or something similar to provide for crop rotation (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>Notwithstanding FFNZ's opposition to allocation (as set out in this document and in FFNZ's submissions on PC1 and Variation 1), FFNZ is concerned that a sub-catchment allocation approach or LUS approach would unlikely provide for commercial vegetable growing due to the nature of the activity and flaws with such approaches.</p>
Mercury NZ Limited Submitter ID: 73182	PC1-9604	Rule 3.11.5.5	RETAIN Rule 3.11.5.5 AND AMEND Rule 3.11.5.5 (d) to read: "...d. The land use is registered	Support in part	FFNZ considers that Rule 5 ought to be retained to provide a reasonable controlled activity pathway for commercial vegetable growing. However, FFNZ

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			to a Certified Industry Sector Scheme; and..."	Oppose in part	<p>considers that amendments are required as set out in its submission on Variation 1, including to substantively amend the matters of control.</p> <p>FFNZ also considers that a new controlled activity rule ought to be adopted to provide for the transfer of commercial vegetable production activity or something similar to provide for crop rotation (see FFNZ's submission on Variation 1).</p> <p>FFNZ refers to its comments above about changing the name of the CIS and in particular that the name should accurately reflect the function.</p>
Ngati Haua Tribal Trust Submitter ID: 73025	PC1-1972	Rule 3.11.5.5	<p>AMEND Rule 3.11.5.5 to provide for the long term averaging of nitrogen losses</p> <p>AND AMEND to include alternative tools such as the use of the natural capital approach</p> <p>AND AMEND by utilising tools such as MENUS as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model</p> <p>AND AMEND where Overseer is to be used as part of the creation of solutions, calculations must be used as a guide only and the focus to be on the trends that are used</p> <p>AND CONSIDER undertaking an industry wide capability assessment to assess who will complete the Farm Environment Plans</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the calculation of the NRP on the basis of a five year rolling average and with a longer benchmarking period and with flexibility for the use of Overseer as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that there is no robust "natural capital" approach currently available and is concerned that this will result in an allocation approach based on LUC (which FFNZ opposes).</p> <p>FFNZ agrees that alternative options or models to Overseer ought to be provided for.</p> <p>FFNZ considers the stock exclusion minimum standards ought to be amended to provide for hill country and extensive farming e.g. assess the requirements on 18 stock units (or a similar approach that looks at intensity) as set out in FFNZ's submission on Variation1.</p> <p>FFNZ does not support matching land use to</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to show land owners and industry how Farm Environment Plans are to be constructed and how the gains are quantified AND CLARIFY how the monitoring of these plans will be undertaken and who will pay for this.		capability because there is no measure of capability that would take into account all natural capital or no measure that is a reasonable proxy for contaminant discharges.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8225	Rule 3.11.5.5	DELETE Rule 3.11.5.5, AND AMEND to make changes as appropriate to reflect the reasons for the submission including: AMEND the matters of control so that it is clear that a decrease in Nitrogen Reference Point is mandatory and is achieved through the adoption of the Best Practicable Options, AND CLARIFY of how retirement of land from commercial vegetable production is to be managed AND AMEND to reduce the delay in practical mitigations being undertaken as part of Farm Environment Plans requirements AND OR the alternative approach permitted activity proposed in the submission [Rule 5 in the alternative approach in the submission] IF the rule is retained as a controlled activity THEN AMEND the Matter of Control (iii) to read: "...iii. The actions and timeframes for undertaking the <u>best practicable option</u> mitigation actions that maintain or reduce the diffuse discharge of nitrogen..."	Oppose	FFNZ considers that Rule 5 ought to be retained to provide a reasonable controlled activity pathway for commercial vegetable growing. However, FFNZ considers that amendments are required as set out in its submission on Variation 1, including to substantively amend the matters of control. FFNZ also considers that a new controlled activity rule ought to be adopted to provide for the transfer of commercial vegetable production activity or something similar to provide for crop rotation (see FFNZ's submission on Variation 1). In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND DELETE matter of control (iv) AND AMEND so that for commercial vegetable production activities Best Practicable Option is implemented through permitted activity standards or a consented industry scheme [under the proposed Rule 3.11.5.4 [Rule 4 in the submission] AND AMEND to apply Best Practicable Option standards for commercial vegetable production consistent with the reduction achieved by Best Practicable Option standard for farming activities.</p>		
<p>Pinnell, Graham Submitter ID: 74007</p>	<p>PC1-4375</p>	<p>Rule 3.11.5.5</p>	<p>AMEND Rule 3.11.5.5 to recognise the value of experiential learning and adaptive management. AND ENSURE focus is on monitoring, including trend monitoring of E.coli, phosphorus, ammonia and clarity during summer low flow. AND AMEND to place an obligation to undertake staged riparian fencing prior to Farm Environment Plan deadlines. AND AMEND to allow a reasonable time between submitting a Farm Environment Plan and completion of stock exclusion works. AND AMEND (f) and (g) so that there is no cap on the area of commercial vegetables for domestic market.</p>	<p>Support in part Oppose in part</p>	<p>In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available.</p> <p>FFNZ agrees that monitoring ought to focus on summer low flow. FFNZ does not support making the minimum standards more stringent e.g. a requirement to undertake staged riparian fencing prior to an FEP.</p> <p>FFNZ agrees that a reasonable period of time ought to be provided for implementation of mitigations including stock exclusion works.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ considers that paragraphs f and g ought to be retained but subject to the other amendments set out in FFNZ's submission on Variation 1 (including a new Rule 5A and a consenting pathway for increases in commercial vegetable production e.g. through amendments to Rule 7). If these other amendments are not made then FFNZ agrees with this submitter that these paragraphs ought to be deleted.</p>
Primary Land Users Group Submitter ID: 71427	PC1-11178	Rule 3.11.5.5	<p>AMEND Rule 3.11.5.5 to read: "a. The property is registered with the Waikato Regional Council in conformance with Schedule A; and b. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and provided to the Waikato Regional Council at the time the resource consent application is lodged; and</p> <p>...</p> <p>e. The areas of land and their locations broken down by sub-catchments [refer to Table 3.11-2] that were used for commercial vegetable production within the property or enterprise each any year in the period 1 July 2006 to 30 June 2016, together with the maximum area of land used for commercial vegetable production within that period, shall be provided to the</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults, five year rolling average, etc.</p> <p>Accordingly, FFNZ opposes the deletion of paragraph b but only on the basis that the changes to the policy and rule framework are made as set out in FFNZ's submission (including a pathway to increase nitrogen or increase the area of commercial vegetable growing and to provide for crop rotation).</p> <p>FFNZ supports the amendment to paragraph e to refer to "any year" in the 10 year period. FFNZ opposes the proposal to delete the last part of paragraph e and paragraphs f and g on the basis that FFNZ considers its proposal (as set out in its submission on Variation 1) appropriately provides for commercial vegetable growing. In the event that</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Council; and f. The total area of land for which consent is sought for commercial vegetable production must not exceed the maximum land area of the property or enterprise that was used for commercial vegetable production during the period 1 July 2006 to 30 June 2016; and g. Where new land is proposed to be used for commercial vegetable production, an equivalent area of and must be removed from commercial vegetable production in order to comply with standard and term f; and h. A Farm Environment Plan for the property...</p> <p>...</p> <p>Matters of Control</p> <p>...</p> <p>iv. The actions and timeframes to ensure that the diffuse discharge of nitrogen does not increase beyond the Nitrogen Reference Point for the property or enterprise."</p> <p>AND AMEND to adopt a sub-catchment management approach AND AMEND to provide clarification on how land will move around the catchments with an enterprise under the proposed consent if provisions are retained.</p>		<p>those changes are not made, FFNZ would support the proposed deletions in the alternative.</p> <p>FFNZ considers that the matters of control require substantive amendment as set out in its submission on Variation 1.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p>
Ravensdown Limited Submitter ID:	PC1-10154	Rule 3.11.5.5	RETAIN the intent of Rule 3.11.5.5 as it is currently written, subject to addressing issues relating to the	Support in part	FFNZ considers that Rule 5 ought to be retained to provide a reasonable controlled activity pathway for commercial vegetable growing. However, FFNZ

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
74058			Nitrogen Reference Point, the Certified Industry Scheme and the qualifications of people to undertake nutrient budgets and Farm Environment Plans addressed elsewhere in this submission. AND DELETE standards and terms f. and g. from Rule 3.11.5.5 and re-number standards and terms h. as f.	Oppose in part	<p>considers that amendments are required as set out in its submission on Variation 1, including to substantively amend the matters of control.</p> <p>FFNZ also considers that a new controlled activity rule ought to be adopted to provide for the transfer of commercial vegetable production activity or something similar to provide for crop rotation (see FFNZ's submission on Variation 1).</p> <p>FFNZ opposes the proposal to delete paragraphs f and g on the basis that FFNZ considers its proposal (as set out in its submission on Variation 1) appropriately provides for commercial vegetable growing (e.g. crop rotation, increases in area, models other than Overseer). In the event that those changes are not made, FFNZ would support the proposed deletions in the alternative.</p>
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5716	Rule 3.11.5.5	<p>Nitrogen Reference Point REMOVE the use of the OVERSEER Model or any other measuring tool in PPC1 until it is accurate both relatively and absolutely. (Rule 3.11.5.5) AND DELETE the use of benchmarking or allocation. AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives. AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves.</p>	<p>Oppose in part</p> <p>Support in part</p>	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p> <p>FFNZ does not support any form of allocation, including grand parenting, for reasons including that there is no need to allocate and any consideration of allocation is premature.</p> <p>FFNZ considers BMP is too high a standard and</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND research a series of mitigations with strong data to support their efficacy and help introduce them. These will in combination with pollution levies have the greatest and fastest effect on water pollution.</p> <p>Proportionality DELETE the use of a proportional system in PPC1 and REPLACE with pollution levies.</p> <p>Allocation REMOVE the use of allocations or benchmarking.</p> <p>AND AMEND to use pollution levies based on the outputs above the assimilative capacity of land.</p> <p>AND REPLACE the use of Overseer with a measuring system that works.</p>		<p>that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that care is required with any prosecution approach because it considers there is significant uncertainty (including in measuring property discharges and the assumptions underlying targets). FFNZ considers that significant gains are likely to be made through farmers obtaining FEPs and that further gains can be made through education and industry support.</p> <p>FFNZ supports a proportionate approach for reasons including that it is reasonable to assess required mitigations based on, amongst other things (see FFNZ's submission on Variation 1), the contribution to the problem.</p> <p>FFNZ does not support pollution levies for reasons including that it is a "blunt" instrument, not sufficiently tailored, not suited for diffuse discharges (which are difficult to directly measure) and is likely to result in significant cost for no net benefit. The proposal to base them on the assimilative capacity of land has additional issues including that there is no reasonable proxy for the assimilative capacity of land and it would amount to an allocation approach (which FFNZ does not support).</p>
Southern Fresh Foods Ltd	PC1-1207	Rule 3.11.5.5	AMEND Rule 3.11.5.5 to remove a Nitrogen Reference Point per entity	Support in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 71408			<p>from the plan AND REPLACE with a Nitrogen Reference Point per crop that reduces 10% over 10 years to a level that is an industry accepted standard for each specific crop AND provide for the establishment of an alternative methods or model, which has the capacity to deal with the complexity levels needed AND AMEND Rule 3.11.5.5 to provide operations that demonstrate clear decreases in diffuse discharges to go from a non-complying activity to a restricted discretionary activity.</p>	Oppose in part	<p>nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not support allocation for reasons including there is no equitable or reliable basis to allocate and it will likely impose significant cost for no net benefit. Accordingly, FFNZ opposes the proposal to establish a NRP per crop and require a 10% reduction for reasons including that this is effectively an allocation approach, is not tailored to individual situations and sub-catchment characteristic and as set out in FFNZ's submission on Variation 1, FFNZ is concerned that nitrogen is the lease of the issues and this does not justify the significant cost such an approach would likely impose.</p> <p>FFNZ considers that a reasonable consenting pathway ought to be provided for land use change and that the requirement that all discharges must be reduce is unduly onerous. It refers to its submission on Variation 1 and in particular the proposal to amend Rule 7 to a discretionary activity with policy support.</p>
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9359	Rule 3.11.5.5	DELETE from Rule 3.11.5.5 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments.	Oppose	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND MAKE any other consequential amendments.		<p>flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>Therefore, FFNZ opposes the deletion of reference to it provided that amendments are made as set out in FFNZ's submission on Variation 1.</p>
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8211	Rule 3.11.5.5	DELETE Rule 3.11.5.5[4](d), AND AMEND the matters of control in Rule 3.11.5.5[4] to reflect Policy 3, AND AMEND to ensure that any increase in diffuse discharges of contaminants associated with commercial vegetable production is a non-complying activity, AND DELETE references that provide for non-notification.	Oppose	<p>FFNZ considers that paragraph d needs to be amended to clarify that membership of a CIS is not compulsory. FFNZ supports providing commercial vegetable growers with the option of a permitted activity or controlled activity consent and refers to the reasons in its submission on Variation 1. Therefore, it opposes the proposal to delete paragraph d.</p> <p>FFNZ considers that the matters of control require significant amendment but as proposed in FFNZ's submission on Variation 1 and not as proposed by this submitter.</p> <p>FFNZ opposes the requirement that any increases in discharges ought to be non complying for reasons including that this will likely impose significant cost for no net benefit, does not target resources to the contaminants most at issue and is unlikely to be practical. FFNZ refers further to the reasons set out in its submission on Variation 1.</p> <p>FFNZ oppose the proposal to delete references to non notification for reasons including that this would likely impose significant cost, delay and uncertainty for no net benefit.</p>

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The Surveying Company Ltd Submitter ID: 73408	PC1-5726	Rule 3.11.5.5	REMOVE Nitrogen Reference Point from PPC1. AND REMOVE capping of area that may be cropped from PPC1.	Oppose	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>Therefore, FFNZ opposes the deletion of reference to it provided that amendments are made as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ also opposes the removal of the land area cap but only on the basis that the amendments proposed in its submission on Variation 1 are made, including to provide a reasonable consenting pathway for land use change.</p>
Waikato Regional Council Submitter ID: 72890	PC1-3444	Rule 3.11.5.5	<p>AMEND Rule 3.11.5.5 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1.</p> <p>AND AMEND Rule 3.11.5.5 to include a specific requirement that land users must farm such that when their farming activities are modelled in OVERSEER®, the OVERSEER® nitrogen leaching loss does not exceed the Nitrogen Reference Point for the property.</p> <p>AND AMEND Rule 3.11.5.5 to resolve the practical implementation</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that the dates ought to be extended and considers the submitter's proposal for 12 months after decisions has merit (although FFNZ considers some dates will need to be longer).</p> <p>FFNZ considers that a requirement to maintain an NRP based on Overseer is likely to create enforcement issues and issues when versions change. FFNZ also has concerns that alternative approaches could result in micro management or input controls e.g. if mitigations or actions to remain in an NRP were to become consent conditions and this would likely impose significant cost and lose flexibility (FFNZ refers further to its submission on Variation 1). FFNZ considers that this requires</p>

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			<p>challenges in the rule, including:</p> <ul style="list-style-type: none"> • the ownership of the Nitrogen Reference Point (property or enterprise) • how the Nitrogen Reference Point concept can accommodate land which comes into or is taken out a commercial vegetable production enterprise. <p>AND AMEND Rule 3.11.5.5 to provide for the rotation of crops within commercial vegetable production prior to 2020 as a permitted activity. AND AMEND Rule 3.11.5.5 to read: “Permitted and Controlled Activity Rule – Existing commercial vegetable production.</p> <p>The use of land for commercial vegetable production and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water, is a permitted activity until 1 January 2020, <u>subject to conditions.</u> From 1 January 2020 from which date <u>the use of land for commercial vegetable production and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water,</u> shall be a controlled activity (requiring</p>		<p>further thought and therefore opposes a specific requirement that land uses must farm so their farming activities when modelled in Overseer do not exceed the NRP.</p> <p>FFNZ supports the ability to re-assign NRPs but considers that there also needs to be the ability to obtain an entirely new NRP as a result of things like subdivision, acquisition of additional land etc. FFNZ considers that the challenge of crop rotation and other issues unique to commercial vegetable growing ought to be addressed as set out in FFNZ’s submission on Variation 1 or in some other appropriate way.</p> <p>FFNZ agrees that commercial vegetable growing prior to this rule coming into effect ought to be provided for but considers the date of 2020 is not appropriate particularly in light of the 2 year delay since notification of PC1 and in light of likely further delay before PC1 is operative.</p> <p>FFNZ would support the amendment to paragraph (c) provided that Schedule C is amended as proposed in FFNZ’s submission on Variation 1, including to ensure it contains all reasonable minimum standards.</p> <p>However, FFNZ considers that significant other amendments (including to the matters of control) are required as set out in its submission on Variation 1.</p> <p>FFNZ opposes the amendment to require commercial vegetable production to be held to the</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>resource consent) subject to the following standards and terms/conditions.</p> <p><u>Rule 3.11.5.5 Conditions for permitted and controlled activity:</u></p> <p>a. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</p> <p>b. A Nitrogen Reference Point is produced for the property or enterprise in conformance with to <u>comply</u> with Schedule B...</p> <p>c. ...</p> <p>d. ...</p> <p>e. ...</p> <p><u>Rule 3.11.5.5 Additional Conditions for controlled activity:</u></p> <p>f. ...</p> <p>g ...</p> <p>h. ...”</p> <p>AND AMEND Rule 3.11.5.5(c) to read: “The use of land for farming activities <u>scattle, horses, deer and pigs</u> are excluded from water bodies in conformance with <u>complies</u> with Schedule C.”</p> <p>AND AMEND Rule 3.11.5.5 (e) to read: “The areas of land, and their locations broken down by sub-catchments..., used for commercial vegetable production <u>in any single financial year</u> within that period, shall be provided to the Council; and”</p> <p>AND AMEND Rule 3.11.5.5(g) to read: “Where new land is proposed</p>		<p>highest in a single financial year and considers that greater flexibility ought to be provided e.g. highest in a 12 month period during that period of time.</p> <p>FFNZ would support the amendment to paragraph g to provide clarity provided that the amendments FFNZ seeks to the policy and rule framework as they apply to commercial vegetable growing are made. If they are not made, FFNZ would oppose the change and considers the paragraph ought to be deleted.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			to be used, that has not previously been used for commercial vegetable production, an equivalent area of land <u>within the same sub-catchment</u> must be removed from commercial vegetable production...” AND AMEND Rule 3.11.5.5 to remove the ability for an enterprise to hold a Nitrogen Reference Point and restrict the Nitrogen Reference Point to exist only with a particular parcel of land.		
Waipa District Council Submitter ID: 67704	PC1-3187	Rule 3.11.5.5	AMEND Rule 3.11.5.5 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules AND AMEND to include additional matters of control, standards and terms and matters of discretion providing for offset mitigation, generally as outlined in Policy 11. The matters should specify the offset: - is for the same contaminant - occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit - remains in place for the duration of the consent and is secured by consent condition	Support in part	FFNZ agrees that amendments are required to clearly explain how things like subdivision and changes to farm enterprise structure or property ownership are dealt with. FFNZ proposes in its submission on Variation 1 that subdivision could be dealt with by a new paragraph f for Rule 4 requiring a new NRP for the lots created by the subdivision. FFNZ supports offsetting and the provision for offsetting in Policy 11 (as amended by FFNZ's submission on Variation 1). However, it considers that care with the matters of control is required and considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11377	Rule 3.11.5.5	AMEND Rule 3.11.5.5 to be consistent with the amendments made by the submission to the rules regarding farming activities.	Oppose in part	FFNZ does not support the sub-catchment collective proposal made by this submitter. FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ considers that Rule 5 ought to be retained to provide a reasonable controlled activity pathway for commercial vegetable growing. However, FFNZ considers that amendments are required as set out in its submission on Variation 1, including to substantively amend the matters of control.</p> <p>FFNZ also considers that a new controlled activity rule ought to be adopted to provide for the transfer of commercial vegetable production activity or something similar to provide for crop rotation (see FFNZ's submission on Variation 1).</p>
Waitomo District Council Submitter ID: 73688	PC1-10333	Rule 3.11.5.5	AMEND Rule 3.11.5.5 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance AND AMEND to include additional matters of control, standards and terms and matters of discretion providing for offset mitigation, generally as outlined in Policy 11. The matters should specify the offset: is for the same contaminant; occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit; and remains in place for the duration of the consent and is secured by consent condition AND AMEND in Rule 3.11.5.5 the	Support in part	<p>FFNZ agrees that amendments are required to clearly explain how things like subdivision and changes to farm enterprise structure or property ownership are dealt with. FFNZ proposes in its submission on Variation 1 that subdivision could be dealt with by a new paragraph f for Rule 4 requiring a new NRP for the lots created by the subdivision.</p> <p>FFNZ supports offsetting and the provision for offsetting in Policy 11 (as amended by FFNZ's submission on Variation 1). However, it considers that care with the matters of control is required and considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).</p> <p>FFNZ supports the NRP provided it is used as a</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			provisions that specifying the Nitrogen Reference Point be calculated and not exceeded, and instead use the Nitrogen Reference Point as part of a Farm Environment Plan to inform mitigation measures.		reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults. FFNZ considers that the proposal that the NRP is part of the FEP to inform mitigation measures has merit because it would address issues regarding enforceability of an Overseer number. However, FFNZ considers that further consideration and/or care is required to ensure that detailed mitigations in FEPs do not become conditions of consent because flexibility is required for farming to respond to things like floods and drought (see FFNZ's submission on Variation 1).
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-9573	Rule 3.11.5.6	CONSIDER supporting programmes that support the retirement of vulnerable areas. Rule 3.11.5.6.	Support in part Oppose in part	FFNZ would support in principle non regulatory programmes (including funding) for retirement of steep and erosion prone land. However, FFNZ considers that this is not suitable as a regulatory approach or requirement.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11001	Rule 3.11.5.6	AMEND Rule 3.11.5.6 to read: "3.11.5.6 Restricted Discretionary Non Complying Activity Rule - The use of land for farming activities Rule 3.11.5.6 Restricted Discretionary Non Complying Activity Rule - The use of land for farming activities The use of land for farming activities	Oppose	FFNZ considers that a reasonable consenting pathway ought to be provided. It considers that it is appropriate to provide for those activities that cannot meet the permitted standards or controlled activity rule as a RD activity. FFNZ's concerns with a non complying activity rule include that this will likely impose significant cost for no net benefit and non complying activity rules ought to be limited to those situations that are not reasonably foreseeable. In the present situation, activities that

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>that does not comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a restricted discretionary non-complying activity (requiring resource consent).</p> <p>Waikato Regional Council restricts its discretion over will <u>consider</u> the following matters:</p> <p>i. <u>Cumulative Effects</u> on water quality of the catchment of the Waikato and Waipā Rivers, <u>including cumulative effects and the extent to which the limits and targets in Schedule E are achieved.</u></p> <p>...</p> <p>Notification: Consent applications will be considered without limited or public notification, and without the need to obtain written approval of affected persons."</p>		<p>cannot meet the permitted standards or controlled activity rule are reasonable foreseeable and ought to be provided for with reasonable matters of discretion. This will provide greater certainty for all involved.</p> <p>FFNZ opposes the Schedule E proposed by this submitter and opposes reference to it in this rule.</p>
Bailey, James Submitter ID: 73926	PC1-9048	Rule 3.11.5.6	<p>DELETE the Rule 3.11.5.6 requirement to manage property level discharges to a Nitrogen Reference Point based on historic profiles</p> <p>AND AMEND to provide a flexibility cap for low leaching farm systems below a certain threshold (20kg/N/ha/yr) that is deemed as a</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that Rule 6 ought to provide for a situation where a farm enterprise cannot achieve its NRP and be based on reasonable assessment criteria (FFNZ refers to the changes to the policy and rule framework in its submission on Variation 1). FFNZ considers that flexibility to increase to a permitted baseline ought to be provided for as a permitted activity, that increases for those above the permitted baseline ought to be provided for as a</p>

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			sustainable level for the transition period, with farmers with a Nitrogen Reference Point below this enabled to increase up to this point.		controlled and the RDA Rule 6 ought to provide for activities including those that want to increase nitrogen but cannot meet these requirements or standards (FFNZ refers to the changes to the policy and rule framework in its submission on Variation 1).
Bailey, James Submitter ID: 73926	PC1-12989	Rule 3.11.5.6	AMEND PPC1 to apply Land Use Suitability and Natural Capital now by including allocation based on the Natural Capital of soils through a Land Use Capability approach.	Oppose	<p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ also considers that there is no reliable proxy for natural capital and that it is not appropriate to allocate on this basis. FFNZ considers that LUS is not sufficiently developed to be of assistance.</p> <p>FFNZ supports an approach that provides flexibility for low intensity farmers to increase. It considers that the threshold is likely to be 15kgN or some other permitted baseline (see FFNZ's submission on Variation 1) but would support 20kgN if it was supported by a robust section 32 assessment.</p>
Charion Investment Trust Submitter ID: 71344	PC1-7796	Rule 3.11.5.6	Rule 3.11.5.6 - RETAIN the use of rules for the control and reduction of nitrogen, phosphorous, sediment and microbial pathogens.	Oppose in part	<p>FFNZ considers that a reasonable consenting framework needs to be provided and considers this can be achieved through the consenting framework proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that the rules need to be hybrid land use and discharge rules due to the nature of</p>

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					diffuse discharges e.g. they cannot be directly measured.
Charion Investment Trust Submitter ID: 71344	PC1-12991	Rule 3.11.5.6	Rule 3.11.5.6: DELETE all the rules and schedules as appropriate to remove provisions for land use consent terms and conditions.	Oppose in part	<p>FFNZ considers that a reasonable consenting framework needs to be provided and considers this can be achieved through the consenting framework proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that the rules need to be hybrid land use and discharge rules due to the nature of diffuse discharges e.g. they cannot be directly measured.</p>
Clarke, Hamish Submitter ID: 71621	PC1-12996	Rule 3.11.5.6	<p>AMEND Rule 3.11.5.6 Farm Environment Plans to focus on addressing actual risks and be targeted at critical point source areas on farms, rather than requiring blanket stock exclusion</p> <p>AND RETAIN Rule 3.11.5.6 Farm Environment Plans for high risk properties</p> <p>AND AMEND to restrict the requirement for Farm Environment Plans to those sub-catchments where science indicates improvements are required</p> <p>AND AMEND to allow farmers the choice of completing their own Farm Environment Plans or seeking the help of consultants</p> <p>AND AMEND to enable Farm Environment Plans to be written to allow flexibility, such as with nitrogen discharges and application of good management practices, tailoring them to the individual property and</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission. FFNZ considers that reasonable minimum standards ought to be provided in Schedule C for stock exclusion and setbacks and that anything more stringent ought to be considered as part of the FEP (FFNZ refers to its submission on Variation 1).</p> <p>FFNZ considers that almost all farming activities ought to obtain a FEP as set out in its submission on Variation 1.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			focusing on critical source management AND CONSIDER an independent panel to allow contested points between staff and farmers in Farm Environment Plans to be settled without the expensive need to appeal to Environment Court.		Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP. FFNZ agrees that flexibility needs to be provided in FEPs and refers to the changes proposed in its submission on Variation 1 to address this, including new policies 2A and 2B. FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10801	Rule 3.11.5.6	AMEND Rule 3.11.5.6 as appropriate to require Good Management Practices.	Support in part Oppose in part	In principle, FFNZ agrees that farming activities ought to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).
Cotman, Jim Submitter ID: 59884	PC1-4591	Rule 3.11.5.6	WITHDRAW PPC1 AND REPLACE with a new plan that endorses 'Best Practical Options' that are developed by landowners. AND AMEND to provide a new plan that supports the development and implementation of Catchment Management Plans that are led by landowners. AND ENSURE that this new plan supports identifying potential critical source contaminant pathways on a sub-catchment basis to provide quantifiable measures and factual	Support in part	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as some submitters have proposed. FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate. FFNZ agrees that robust science and information is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>information into Catchment Management Plans.</p> <p>AND ENSURE the new plan encourages innovative new science that provide alternative means to managing water quality.</p> <p>AND ENSURE the new plan recognises that well informed landowners as stewards of their land are the best and only people who can create action on the ground.</p> <p>AND ENSURE the new plan approach favours a 'shared values' approach where all parties work toward achieving sensible water quality targets.</p> <p>AND ENSURE that the primary focus of the new plan is a comprehensive programme to eliminate Koi Carp along with the native species predator, catfish.</p>		<p>required over the lifetime of this plan.</p> <p>FFNZ agrees that landowners ought to be involved in the preparation of FEPs and in the development of mitigations.</p> <p>FFNZ considers that a rules framework is needed but that this ought to provide a reasonable consenting or permitted activity pathway as proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that koi carp need to be addressed and that the focus ought to be on all sources of contaminants, not just diffuse discharges from farming activities.</p>
Department of Conservation Submitter ID: 71759	PC1-11058	Rule 3.11.5.6	RETAIN Rule 3.11.5.6.	Support in part	FFNZ agrees that Rule 6 ought to be retained. However, FFNZ considers that amendments are required including to place some reasonable parameters around discharges of the focus on the elements of FFNZ's MPA proposal (FFNZ refers to its submission on Variation 1). FFNZ also considers that amendments need to be made to the policy framework to support and enable this rule, and that this rule ought to reasonably apply to any activity that does not comply with the permitted or controlled activity rules (FFNZ refers to its submission on Variation 1).
Farmers 4 Positive Change (F4PC)	PC1-10433	Rule 3.11.5.6	AMEND Rule 3.11.5.6 to use Farm Environment Plans as a tool to	Support in part	FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73355			understand land use suitability and manage contaminant loss AND AMEND to include a range of actions in Farm Environment Plans, such as avoid farming older cattle on slopes in winter or when wet; farm cattle extensively on slopes; fence off swamps and plant out to provide silt traps to remove sediment; construct sediment traps near the headwaters to help slow flow and trap sediment; plant shade trees away from waterways to discourage stock camps and nutrient build-up; use temporary electric fencing where and when necessary; plant poplar poles on erosion prone slopes; identify suitable units for planting pines at farmer discretion; fence off waterways on more intensively farmed areas of the farm and provide reticulated water for stock.	Oppose in part	assessment and applying the MPA framework set out in FFNZ's submission on Variation 1. FFNZ has concerns about the submitter's proposal to use FEPS to understand land use suitability and would oppose such a proposal if it involved allocating contaminants or was used in a regulatory context to require land use change or specify what activities could occur. FFNZ considers that FEPs ought to be sufficiently flexible to consider a range of mitigations (guided by FFNZ's MPA framework) and if the suggestion is to list the potential mitigations FFNZ would oppose such an approach because it considers that there needs to be sufficient flexibility and tailoring to the specific situation.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10631	Rule 3.11.5.6	RETAIN Rule 3.11.5.6.	Support in part	FFNZ agrees that Rule 6 ought to be retained. However, FFNZ considers that amendments are required including to place some reasonable parameters around discharges of the focus on the elements of FFNZ's MPA proposal (FFNZ refers to its submission on Variation 1). FFNZ also considers that amendments need to be made to the policy framework to support and enable this rule, and that this rule ought to reasonably apply to any activity that does not comply with the permitted or controlled activity rules (FFNZ refers to its submission on Variation 1).
Fonterra Co-	PC1-10506	Rule 3.11.5.6	DELETE Rule 3.11.5.6 and	Oppose	FFNZ considers that Rule 6 ought to be retained as

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
operative Group Ltd Submitter ID: 74057			<p>REPLACE with a Rule that reads: <u>"3.11.5.6 Discretionary Activity Rule – The use of land for farming activities</u> <u>The following activities are discretionary activities (requiring resource consent):</u> 1. <u>The use of land for farming activities and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water that does not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 subject to the following standards and terms:</u> a. <u>The three-year rolling average does not exceed the Nitrogen Reference Point, or where no Nitrogen Reference Point has been calculated the average nitrogen loss for the property or enterprise over the three-year period ending 30 June of the year preceding the year the application is made.</u> 2. <u>Any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā River catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares:</u> i. <u>Woody vegetation to farming</u></p>		<p>a RDA rule. However, FFNZ considers that amendments are required including to place some reasonable parameters around discharges of the focus on the elements of FFNZ’s MPA proposal (FFNZ refers to its submission on Variation 1). FFNZ also considers that amendments need to be made to the policy framework to support and enable this rule, and that this rule ought to reasonably apply to any activity that does not comply with the permitted or controlled activity rules (FFNZ refers to its submission on Variation 1).</p> <p>FFNZ opposes the proposal to make Rule 6 a discretionary activity rule for reasons including that non compliance with Rules 1 to 5 is reasonably foreseeable and the matters of discretion readily identifiable. FFNZ is also concerned that making the rule discretionary will create unnecessary cost that will outweigh any benefit.</p> <p>FFNZ also opposes the proposed changes because (and refers to its submission on Variation 1 for more details):</p> <ul style="list-style-type: none"> • FFNZ considers that the NRP ought to be calculated on a five year rolling average basis to provide reasonable flexibility. • FFNZ considers that land use change ought to be provided for as a discretionary rule but as a separate rule and not part of Rule 6.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>activities; or</u> <u>ii. Any livestock grazing other than dairy farming to dairy farming; or</u> <u>iii. Arable cropping to dairy farming;</u> <u>or</u> <u>iv. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</u> <u>Subject to the following standards and terms:</u> <u>a. The three-year rolling average does not exceed the Nitrogen Reference Point, or where no Nitrogen Reference Point has been calculated the average nitrogen loss for the property or enterprise over:</u> <u>b. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C.</u> <u>NOTE: for the purposes of this rule, 'occurring' means a land use being undertaken and this phrase does not include changes in land use for which resource consent or certificates of compliance might have been held but no increased discharges of contaminants had commenced as at 22 October 2016."</u> AND AMEND other parts of PPC1 as necessary to clarify that land use change within a property or enterprise (>4.1 ha) that does not increase the total area within that property devoted to that land use</p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			beyond 4.1 hectares is not caught by this rule.		
Greenlea Premier Meats Ltd Submitter ID: 72144	PC1-7550	Rule 3.11.5.6	<p>DELETE requirements for land use activities to not exceed their historic nitrogen discharge levels when below 20kgN/ha/yr.</p> <p>AND AMEND to enable low leaching and land uses (below 20kgN/ha/yr) to increase discharges up to 20kgN/ha/yr.</p> <p>AND AMEND by basing the nitrogen allocation system on the natural capital of soils taking into consideration the assimilative capacity of freshwater.</p>	Oppose in part	<p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ considers that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults. FFNZ refers further to its submission on Variation 1.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ also considers that there is no reliable proxy for natural capital and that it is not appropriate to allocate on this basis.</p> <p>FFNZ supports an approach that provides flexibility for low intensity farmers to increase. It considers that the threshold is likely to be 15kgN or some other permitted baseline (see FFNZ's submission on Variation 1) but would support 20kgN if it was supported by a robust section 32 assessment.</p>
Hancock Forest Management (NZ) Ltd	PC1-5781	Rule 3.11.5.6	AMEND Rule 3.11.5.6 to the matter for control to ensure that the Best Practicable Options approach is	Oppose	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73724			applied to applicants for a resource consent.		set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10149	Rule 3.11.5.6	<p>AMEND Rule 3.11.5.6 to read: "Rule 3.11.5.6 - Restricted Discretionary Activity Rule - The use of land for <u>Discharges from</u> farming activities <u>Discharges related to the use of land for farming activities that either:</u> <u>a. does not</u>cannot comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a restricted discretionary activity (requiring resource consent); or <u>b. is for new commercial vegetable cropping that can demonstrate a lesser effect from the contaminant discharge compared with the existing activity (when the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens are considered together):</u> <u>Is a restricted discretionary activity (requiring resource consent).</u> Waikato Regional Council restricts its discretion over the following matters: i. Cumulative effects on water quality</p>	Oppose in part	<p>In principle, FFNZ supports retaining the diffuse discharge rules (save for the new Rule 5A proposed in FFNZ's submission on Variation 1) as hybrid land use and discharge rules for reasons including that the nature of diffuse discharges is different from point source (e.g. it cannot be observed or easily measured and cannot be easily controlled) and for the reasons set out in its submission on Variation 1. FFNZ therefore considers that the start of the rule ought to refer to "the use of land ..."</p> <p>FFNZ opposes substituting the words "cannot" for "does not." The rule should provide an option for farmers who do not comply with Rules 1 to 5 and it should rely on Council (or anyone else's) assessment of whether they can or cannot comply.</p> <p>FFNZ considers that new commercial vegetable cropping ought to be considered as part of an amended Rule 7 that is a discretionary activity with appropriate policy support (see FFNZ's submission on Variation 1).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>of the catchment of the Waikato and Waipā Rivers.</p> <p>ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</p> <p>iii. The need for and the content of a Farm Environment Plan.</p> <p>iv. The term of the resource consent.</p> <p>v. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</p> <p>vi. The time frame and circumstances under which the consent conditions may be reviewed.</p> <p>vii. The matters addressed by Schedules A, B and C.</p> <p>viii. <u>With respect to applications made under 3.11.5.6(b), the relevant clauses of Policy 3 (except Policy 3(b))</u></p> <p>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons."</p>		
Hurley, Peter James Submitter ID: 71391	PC1-1116	Rule 3.11.5.6	<p>DELETE Rule 3.11.5.6 provisions that relate to excluding cattle from water bodies through permanent fencing in their entirety.</p> <p>OR, if not deleted in their entirety AMEND so that the requirement to exclude cattle through permanent fencing is tailored on a farm by farm basis where there is a proven water</p>	Support in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>quality issue in relation to stock access to water bodies. Allow flexibility to provide for alternative approaches to achieve the same outcome.</p> <p>AND AMEND so that the ability to muster cattle through a water body without requiring a formed stock crossing structure when crossing less than three times weekly.</p> <p>AND MAKE any consequential amendments.</p>		<p>something that ought to be considered as part of a FEP and tailored to the particular situation.</p>
Hurley, Peter James Submitter ID: 71391	PC1-13033	Rule 3.11.5.6	<p>Rule 3.11.5.6 Nitrogen Reference Point: RETAIN nitrogen discharge reductions to the 75th percentile nitrogen leaching value.</p> <p>AND AMEND so that sheep and beef farms and extensive operations (at or under 18 stock units) do not have to manage to a Nitrogen Reference Point.</p> <p>AND AMEND to ensure that when the OVERSEER Model is used, best management practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters.</p> <p>AND AMEND to use Olsen-p from soil tests as a marker for nutrient loss.</p> <p>AND AMEND so that the restrictions and assessments of effects are not limited to the consideration of</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>In principle, FFNZ supports an approach that requires the 75th percentile to reduce but FFNZ considers that further consideration needs to be given to the appropriate spatial scale (e.g. the Upper Waikato FMU is too large and varied) and to how the NRP is calculated. FFNZ also considers that an appropriate consenting pathway ought to be provided where it is not possible to reduce. FFNZ refers further to its submission on Variation 1.</p> <p>FFNZ considers that all properties ought to obtain an NRP and does not agree that properties with</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			nitrogen discharges as modelled by the OVERSEER Model. AND DELETE the Nitrogen Reference Point (grandparenting) clauses and standards. AND MAKE any consequential amendments.		less than 18 stock units should be excluded. FFNZ considers that flexibility should be provided to increase e.g. less than 15kgN can increase up to 15kgN and refers further to its submission on Variation 1.
Hurley, Peter James Submitter ID: 71391	PC1-13034	Rule 3.11.5.6	Rule 3.11.5.6 Farm Environment Plans: AMEND to require Farm Environment Plans only in sub-catchments where science indicates that improvements are required AND AMEND Farm Environment Plans to allow flexible such as with nitrogen discharges and the application of good management practices. Farm Environment Plans should be tailored to the individual property and focus on critical source management rather than a blanket approach AND ADD provision for an independent panel that decides on points of contention between farmers and staff. Therefore Farm Environment Plans can be settled without the expense of an Environment Court appeal process AND MAKE any consequential amendments.	Support in part Oppose in part	FFNZ supports almost all farm enterprises obtaining a FEP. FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate. FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1. FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.
Hurley, Peter James Submitter ID: 71391	PC1-13035	Rule 3.11.5.6	Rule 3.11.5.6 Land Use Change: ADD policies and rules that manage effects that are based on the natural capital of soils and their productive	Oppose in part	FFNZ considers that land use change ought to be provided for as a discretionary activity with appropriate policy support and refers to its submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			potential rather than blanket rules based on existing land uses AND ADD an exception to land use change restrictions for properties (including those below 40ha) where environmental effects are minimal or positive, such as improvements in biodiversity, sediment retention, phosphorus retention, economic efficiency and optimization of natural resources) AND AMEND so that the implementation of the rules are low cost and not impeded by bureaucracy AND MAKE any consequential amendments.		FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit. FFNZ also considers that there is no reliable proxy for natural capital and that it is not appropriate to allocate on this basis.
Matira Sub Catchment Group Submitter ID: 74148	PC1-9303	Rule 3.11.5.6	DELETE Rule 3.11.5.6 in its entirety OR AMEND to provide a land use suitability and a sub-catchment method that would work better.	Oppose	While FFNZ supports a sub-catchment approach (provided it is non-regulatory and based on tailored FEPs) and tailored FEPs, FFNZ considers that Rule 6 ought to be retained. FFNZ considers that amendments are required including to place some reasonable parameters around discharges of the focus on the elements of FFNZ's MPA proposal (FFNZ refers to its submission on Variation 1). FFNZ also considers that amendments need to be made to the policy framework to support and enable this rule, and that this rule ought to reasonably apply to any activity that does not comply with the permitted or controlled activity rules (FFNZ refers to its submission on Variation 1).
Miraka Limited Submitter ID: 73492	PC1-8893	Rule 3.11.5.6	RETAIN Rule 3.11.5.6	Support in part	FFNZ agrees that Rule 6 ought to be retained. However, FFNZ considers that amendments are required including to place some reasonable

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					parameters around discharges of the focus on the elements of FFNZ's MPA proposal (FFNZ refers to its submission on Variation 1). FFNZ also considers that amendments need to be made to the policy framework to support and enable this rule, and that this rule ought to reasonably apply to any activity that does not comply with the permitted or controlled activity rules (FFNZ refers to its submission on Variation 1).
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11862	Rule 3.11.5.6	RETAIN Rule 3.11.5.6.	Support in part	FFNZ agrees that Rule 6 ought to be retained. However, FFNZ considers that amendments are required including to place some reasonable parameters around discharges of the focus on the elements of FFNZ's MPA proposal (FFNZ refers to its submission on Variation 1). FFNZ also considers that amendments need to be made to the policy framework to support and enable this rule, and that this rule ought to reasonably apply to any activity that does not comply with the permitted or controlled activity rules (FFNZ refers to its submission on Variation 1).
Ngati Haua Tribal Trust Submitter ID: 73025	PC1-1973	Rule 3.11.5.6	AMEND Rule 3.11.5.6 to provide for the long term averaging of nitrogen losses AND AMEND to include alternative tools such as the use of the natural capital approach AND AMEND by utilising tools such as MENUs as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model AND AMEND where Overseer is to be used as part of the creation of	Support in part Oppose in part	FFNZ supports the calculation of the NRP on the basis of a five year rolling average and with a longer benchmarking period and with flexibility for the use of Overseer as set out in FFNZ's submission on Variation 1. FFNZ considers that there is no robust "natural capital" approach currently available and is concerned that this will result in an allocation approach based on LUC (which FFNZ opposes). FFNZ agrees that alternative options or models to Overseer ought to be provided for.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			solutions, calculations must be used as a guide only and the focus to be on the trends that are used.		FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.
Ngati Haua Tribal Trust Submitter ID: 73025	PC1-13075	Rule 3.11.5.6	Rule 3.11.5.6 - CONSIDER undertaking an industry wide capability assessment to assess who will complete the plans AND AMEND to show land owners and the industry how these are to be constructed and how the gains are quantified AND AMEND to provide clarity as to how the monitoring of these plans will be undertaken and who will pay for this AND AMEND to provide a unified approach to timeframes and content of consents issued.	Support in part	FFNZ shares the submitter's concerns about capability and capacity to complete FEPs and agrees that options to address that ought to be explored e.g. industry capability assessment, demonstrations of how FEPs could be developed, etc. FFNZ agrees that clarity ought to be provided about monitoring, particularly in light of FFNZ's concerns that a "micro management" approach to detailed actions in FEPs should not be adopted and flexibility is needed (FFNZ refers further to its submission on variation 1).
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8707	Rule 3.11.5.6	AMEND Rule 3.11.5.6 to make changes as appropriate to reflect the reasons for the submission including the scope of Council's discretion to compel reductions to achieve the Objectives of PPC1 AND OR the alternative approach proposed in the submission [overview in Table 2 of the submission - Rule 6]. AND AMEND Rule 3.11.5.6 to read:	Oppose	This submitter proposes significant changes to the rules framework based on what has called a BPO approach. In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>"The use of land for farming activities or <u>commercial vegetation production</u> that does not comply with the conditions, standards or terms of Rule 3.11.5.1 to 3.11.5.5 and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a Restricted Discretionary Activity (requiring resource consent). Waikato Regional Council restricts its discretion over the following matters:...</p> <p>vii. The matters addressed by Schedules A, B and C.</p> <p>viii. <u>The actions and timeframes for undertaking mitigation actions that reduce the diffuse discharges of activities nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water and whether those actions are likely to achieve the same or better reductions in those contaminants than the minimum standards under Rules 3.11.5.1, 3.11.5.4 and 3.11.5.5</u></p> <p>ix. <u>the provision of information under Rules 3.11.5.1, 3.11.5.4 and 3.11.5.5.</u></p> <p><u>Applications should include the information requirements contained in</u></p>		<p>quality etc.</p> <p>Therefore, FFNZ does not agree with the changes this submitter proposes to Rule 6 which are to largely reflect its BPO approach.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>Schedule 1</u> <u>The normal tests for notification apply."</u>		
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-13076	Rule 3.11.5.6	ADD to Rule 3.11.5.6 a new Matter of Control that reads: " <u>...Mitigation actions that maintain or reduce the diffuse discharge of nitrogen, phosphorus or sediment to water or to land where those contaminants may enter water including Best Management Practices to achieve Objective 3...</u> "	Oppose	FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).
Pinnell, Graham Submitter ID: 74007	PC1-4377	Rule 3.11.5.6	AMEND Rule 3.11.5.6 to recognise the value of experiential learning and adaptive management.	Support in part Oppose in part	In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available.
Pinnell, Graham Submitter ID: 74007	PC1-13082	Rule 3.11.5.6	Rule 3.11.5.6 - AND ENSURE focus is on monitoring, including trend monitoring of E.coli, phosphorus, ammonia and clarity during summer low flow.	Support in part	FFNZ agrees that monitoring ought to focus on summer low flow. FFNZ does not support making the minimum standards more stringent e.g. a requirement to undertake staged riparian fencing prior to an FEP.
Pinnell, Graham Submitter ID: 74007	PC1-13083	Rule 3.11.5.6	AMEND Rule 3.11.5.6 to place an obligation to undertake staged riparian fencing prior to Farm Environment Plan deadlines AND AMEND to allow a reasonable time between submitting a Farm Environment Plan and completion of stock exclusion works.	Support in part Oppose in part	FFNZ considers that stock exclusion and set back minimum standards ought to be provided in Schedule C as proposed in its submission on Variation 1. FFNZ considers that the need for riparian planting ought to be considered as part of a FEP (after looking at critical source areas and using MPA as opposes in FFNZ's submission on Variation 1). FFNZ refers to the reasons set out in its submission on Variation 1. Accordingly, FFNZ opposes a requirement to undertake riparian fencing prior to FEPs. FFNZ agrees that a reasonable period of time ought

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					to be provided for implementation of mitigations including stock exclusion works.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9360	Rule 3.11.5.6	DELETE from Rule 3.11.5.6 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.	Oppose	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). Therefore, FFNZ opposes the deletion of reference to it provided that amendments are made as set out in FFNZ's submission on Variation 1.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11812	Rule 3.11.5.6	RETAIN Rule 3.11.5.6.	Support in part	FFNZ agrees that Rule 6 ought to be retained. However, FFNZ considers that amendments are required including to place some reasonable parameters around discharges of the focus on the elements of FFNZ's MPA proposal (FFNZ refers to its submission on Variation 1). FFNZ also considers that amendments need to be made to the policy framework to support and enable this rule, and that this rule ought to reasonably apply to any activity that does not comply with the permitted or controlled activity rules (FFNZ refers to its submission on Variation 1).
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8213	Rule 3.11.5.6	AMEND Rule 3.11.5.6 to ensure that any increase in discharges from commercial vegetable production is a non-complying activity.	Oppose	FFNZ considers that it is important that the potential for discharges to increase are provided for as a RDA (within the context of a suitable rule and policy framework as set out in FFNZ's submission on Variation 1) and considers that a non complying threshold is too high and unreasonable. Therefore it opposes the submission point.

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The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-13115	Rule 3.11.5.6	Rule 3.11.5.6 - AMEND to ensure that non-compliance with Rule 3.11.5.2(3) and (4) is a non-complying activity AND DELETE references that provide for non-notification.	Oppose	FFNZ that a non complying threshold is too high and unreasonable. Non compliance with Rules 3 and 4 is reasonably foreseeable and able to be addressed and provided for in matters of discretion. This will reduce costs, create certainty and achieve sustainable management. FFNZ considers that there is no need to notify these applications and non-notification will only increase cost and uncertainty. Therefore FFNZ opposes the submission point.
Timberlands Limited Submitter ID: 73036	PC1-3439	Rule 3.11.5.6	AMEND Rule 3.11.5.6 as appropriate to require a Good Management Practices approach as described for Rules 3.11.5.1 to 3.11.5.5.	Oppose in part	In principle, FFNZ supports the adoption of industry agreed GMP. However, FFNZ considers that this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs. FFNZ's concerns include that adopting GMP would be inflexible, would likely impose significant cost and might result in rigid and untailored input controls (see FFNZ's submission on Variation 1).
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10508	Rule 3.11.5.6	RETAIN Rule 3.11.5.6.	Support in part	FFNZ agrees that Rule 6 ought to be retained. However, FFNZ considers that amendments are required including to place some reasonable parameters around discharges of the focus on the elements of FFNZ's MPA proposal (FFNZ refers to its submission on Variation 1). FFNZ also considers that amendments need to be made to the policy framework to support and enable this rule, and that this rule ought to reasonably apply to any activity that does not comply with the permitted or controlled activity rules (FFNZ refers to its submission on Variation 1).

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Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3525	Rule 3.11.5.6	RETAIN Rule 3.11.5.6.	Support in part	FFNZ agrees that Rule 6 ought to be retained. However, FFNZ considers that amendments are required including to place some reasonable parameters around discharges of the focus on the elements of FFNZ's MPA proposal (FFNZ refers to its submission on Variation 1). FFNZ also considers that amendments need to be made to the policy framework to support and enable this rule, and that this rule ought to reasonably apply to any activity that does not comply with the permitted or controlled activity rules (FFNZ refers to its submission on Variation 1).
Waikato Regional Council Submitter ID: 72890	PC1-3477	Rule 3.11.5.6	AMEND Rule 3.11.5.6 by adding a new matter over which Council reserves its discretion to read: " <u>viii. Consistency with the Objectives and Policies of the Waikato Regional Plan or proposed regional plan.</u> "	Oppose in part	FFNZ considers that there is no need for this amendment because the relevant aspects of the objectives are provided for in Rule 6 (particularly if it is amended as requested in FFNZ's submission on Variation 1). FFNZ also has concerns about the objectives (especially the 80 year targets) and refers to its submission on Variation 1. Therefore FFNZ does not agree that a new matter of discretion ought to be added as proposed.
Waipa District Council Submitter ID: 67704	PC1-3189	Rule 3.11.5.6	AMEND Rule 3.11.5.6 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules AND AMEND to include in Rule 3.11.5.6 additional matters of control, standards and terms and matters of discretion providing for offset mitigation, generally as outlined in Policy 11. The matters should specify the offset: - is for the same contaminant - occurs in the same sub-catchment,	Support in part	FFNZ agrees that amendments are required to clearly explain how things like subdivision and changes to farm enterprise structure or property ownership are deal with. FFNZ proposes in its submission on Variation 1 that subdivision could be dealt with by a new paragraph f for Rule 4 requiring a new NRP for the lots created by the subdivision. FFNZ supports offsetting and the provision for offsetting in Policy 11 (as amended by FFNZ's submission on Variation 1). However, it considers that care with the matters of control is required and considers that offsets for different contaminants and different sub-catchments ought to be provided for

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			or if not practicable within the same Freshwater Management Unit - remains in place for the duration of the consent and is secured by consent condition		(albeit possibly through the RD activity rule).
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11378	Rule 3.11.5.6	<p>AMEND Rule 3.11.5.6 to read: "Rule 3.11.5.6 Restricted Discretionary activity rule - the use of land for farming activities</p> <p><u>A. The use of land by an enterprise for sub-catchment farming activities and the associated diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a restricted discretionary activity (requiring resource consent) subject to the following requirements:</u></p> <p><u>A Sub-catchment management plan (prepared in accordance with [new] Schedule 2) is to be provided to the Waikato Regional Council at the time when the resource consent application is lodged.</u></p> <p><u>Waikato Regional Council restricts its discretion under Rule 3.11.5.6.A over the following matters:</u></p> <p><u>i. Conformance with Policy 6(c);</u></p> <p><u>ii. Cumulative effects on water quality in the relevant sub-catchment(s);</u></p> <p><u>iii. The content of the Sub-catchment management plan prepared for the relevant sub-catchment by the relevant enterprise</u></p>	Oppose	<p>FFNZ understands this submitter proposes a framework based on allocation to sub-catchment collectives. While FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1), it does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate. This is for reasons including that it is an allocation approach (FFNZ does not support allocation) and will likely result in significant cost for no net benefit.</p> <p>FFNZ opposes the proposed amendments to Rule 6 because they give effect to the submitter's sub-catchment collective proposal and because it results in unfair discrimination between those in a collective and those who are not when FFNZ considers that any rules ought to be effects based.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>in accordance with the requirements of [new] Schedule 2:</p> <p><u>iv. The need for and content of a Farm Environmental Plan;</u></p> <p><u>v. The adoption of an adaptive management and mitigation approach to manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens;</u></p> <p><u>vi. The term of the resource consent having regard to Policy 13;</u></p> <p><u>vii. The timeframe and circumstances under which the consent conditions may be reviewed.</u></p> <p><u>B. The use of land for farming activities that does not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 ...</u></p> <p>Waikato Regional Council restricts its discretion under <u>Rule 3.11.5.6.B</u> over the following matters:</p> <p>...iv. The term of the resource consent having regard to Policy 13....</p> <p><u>C. The use of land for farming activities and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water that does not comply with the conditions, standards or terms of Rules 3.11.5.6.A or 3.11.5.6.B is a discretionary activity (requiring resource consent) subject to the</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>following requirements:</u> A Sub-catchment management plan (prepared in accordance with [new] Schedule 2) is to be provided to the Waikato Regional Council at the time when the resource consent application is lodged.</p> <p><u>Notification:</u> Consent applications under Rules 3.11.5.6.A, 3.11.5.6.B, and 3.11.5.6.C will be considered without notification, and without the need to obtain written approval of affected persons.</p> <p><u>Advisory note:</u> The assessment of any applications under these rules shall take into account the matters identified in Policies 6(b) and 10-13 of Section 3.11.3."</p>		
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2143	Rule 3.11.5.6	RETAIN Rule 3.11.5.6 as proposed.	Support in part	FFNZ agrees that Rule 6 ought to be retained. However, FFNZ considers that amendments are required including to place some reasonable parameters around discharges of the focus on the elements of FFNZ's MPA proposal (FFNZ refers to its submission on Variation 1). FFNZ also considers that amendments need to be made to the policy framework to support and enable this rule, and that this rule ought to reasonably apply to any activity that does not comply with the permitted or controlled activity rules (FFNZ refers to its submission on Variation 1).
Waitomo District Council Submitter ID:	PC1-10334	Rule 3.11.5.6	AMEND Rule 3.11.5.6 to clarify how changes in property boundaries and lease arrangements with properties	Support in part	FFNZ agrees that amendments are required to clearly explain how things like subdivision and changes to farm enterprise structure or property

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
73688			and enterprises will affect compliance. AND AMEND to include additional matters of control, standards and terms and matters of discretion providing for offset mitigation, generally as outlined in Policy 11. The matters should specify the offset: is for the same contaminant; occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit; and remains in place for the duration of the consent and is secured by consent condition.		ownership are deal with. FFNZ proposes in its submission on Variation 1 that subdivision could be dealt with by a new paragraph f for Rule 4 requiring a new NRP for the lots created by the subdivision. FFNZ supports offsetting and the provision for offsetting in Policy 11 (as amended by FFNZ's submission on Variation 1. However, it considers that care with the matters of control is required and considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).
Waitomo District Council Submitter ID: 73688	PC1-13125	Rule 3.11.5.6	AMEND in Rule 3.11.5.6 the provisions that specifying the Nitrogen Reference Point be calculated and not exceeded, and instead use the Nitrogen Reference Point as part of a Farm Environment Plan to inform mitigation measures.	Support in part	FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults. FFNZ considers that the proposal that the NRP is part of the FEP to inform mitigation measures has merit because it would address issues regarding enforceability of an Overseer number. However, FFNZ considers that further consideration and/or care is required to ensure that detailed mitigations in FEPs do not become conditions of consent because flexibility is required for farming to respond to things like floods and drought (see FFNZ's submission on Variation 1).
Alcock, Carl and Jo	PC1-2174	Rule 3.11.5.7	AMEND Rule 3.11.5.7 by establishing	Support in	While FFNZ opposes blanket rules (it supports a

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73376			<p>policies and rules which relate to managing effects and are based on recognition of productive underlying soil properties rather than blanket rules based on existing land use.</p> <p>AND AMEND by providing exceptions to land use change restrictions including for smaller land areas and where environmental effects are minimal or advantageous.</p> <p>AND AMEND by not limiting the restrictions and assessment of effects to consideration of the nitrogen discharges as modelled by OVERSEER.</p> <p>AND MAKE any consequential amendments arising.</p> <p>Nitrogen Reference Point</p> <p>AMEND by removing the Nitrogen Reference Point and use of Overseer.</p> <p>AND AMEND by adopting a sub-catchment approach to addressing contaminants relevant to each sub-catchment.</p> <p>AND AMEND by removing a blanket restriction of one nutrient that may not even be relevant for that sub-catchment.</p> <p>AND AMEND by using Farm Environment Plans to determine what is best for each farm and science to determine what contaminants are an issue in each sub-catchment.</p> <p>DELETE the Nitrogen Reference</p>	<p>part</p> <p>Oppose in part</p>	<p>tailored and proportionate approach as set out in its submission on Variation 1), it does not support an approach based on recognition of productive underlying soil properties for reasons including that this is or will likely result in allocation (which FFNZ opposes) and there is no reasonable proxy for the soil properties and contaminant discharges or assimilative capacity.</p> <p>FFNZ considers that land use change ought to be provided for as a discretionary activity with appropriate policy support as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports almost all properties obtaining FEPs as set out and provided for in its submission on Variation 1.</p> <p>FFNZ agrees that appropriate flexibility ought to be</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Point and Overseer from all other areas in PPC1. AND MAKE any other consequential amendments. Farm Environment Plan AND AMEND by requiring Farm Environment Plans only in sub-catchments where science indicates improvements are required. AND AMEND by allowing flexibility in Farm Environment Plans so that they can be tailored to the individual property and focus on critical source management rather than blanket regulatory standards. AND establish an independent panel to allow contested points between staff and farmers to be settled without the expensive need to appeal to the Environment Court. AND MAKE any other consequential amendments arising from this submission point.</p>		<p>provided for in FEPs and refers to its submission on Variation 1, including proposed new Policies 2A and 2B.</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's submission on Variation 1.</p>
Aston, Lucy Submitter ID: 73020	PC1-7160	Rule 3.11.5.7	<p>DELETE Rule 3.11.5.7. OR AMEND Rule 3.11.5.7 by removing blanket rules based on existing land use and establishing policies and rules which relate to managing effects based on the underlying soil properties. AND AMEND PPC1 so that land use change is permitted where environmental effects are minimal or advantageous (improvements in biodiversity, sediment</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that Rule 7 ought to be a discretionary activity and refers to its submission on Variation 1.</p> <p>FFNZ agrees that there should not be a blanket land use change rule based on existing land use but does not agree that the rule should relate to managing effect based on the underlying soil properties for reasons including that there is no reasonable proxy for "natural capital" or the suitability of land for farming activities and such an approach would likely impose significant cost for no</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>or phosphorous retention, economic efficiency and optimisation of natural resources), including for land areas below 40 hectares AND AMEND PPC1 so that restrictions and assessment of the effects is not limited to nitrogen discharges as modelled by the OVERSEER Model AND DELETE the Nitrogen Reference Point (grandparenting) provisions of PPC1 AND, if the Nitrogen Reference Point requirements are not deleted, AMEND PPC1 so that Overseer is not solely relied on but is used as part of a range of measurement tools AND AMEND PPC1 so that where Overseer is used that the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters AND REMOVE the requirement for operations at or under 18 stock units, and sheep and beef farmers to have to manage to a Nitrogen Reference Point AND AMEND PPC1 to adopt a sub-catchment approach to addressing contaminants that are relevant to each farm and water body AND AMEND PPC1 so that where nitrogen discharges from a</p>		<p>net benefit.</p> <p>FFNZ agrees that land use change ought to be provided for but considers the proposed threshold of “minimal effects or advantageous” is too strict a threshold. FFNZ considers that it ought to be provided for as a discretionary activity but with policy support as set out in FFNZ’s submission on Variation 1.</p> <p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards and it is not used for enforcement and compliance.</p> <p>FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ’s submission on Variation 1).</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>property have to be allocated then the allocation system is based on the natural capital of soils and the water quality outcomes that are to be achieved for each sub-catchment, not on the 2014/15 or 2015/16 land use or grandparenting approach AND AMEND PPC1 so that Farm Environment Plans are used to determine what would work best on each farm AND AMEND the Farm Environment Plan requirements so they are only required in sub-catchments where science indicates improvements are required AND AMEND PPC1 so that for Farm Environment Plans an independent panel is available to ensure accountability and enable contested points to be settled without appeals to the Environment Court AND AMEND the stock exclusion provisions of PPC1 to the standards recommended in the Clean Water Report (February 2017) AND AMEND the stock exclusion provisions of PPC1 so fencing is required above 15 degree slope for farming operations greater than 18su/ha AND AMEND PPC1 so mitigations are set on a farm by farm basis, focused on management of clearly identified and measurable</p>		<p>allocate contaminants and/or self regulate.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ also considers that there is no reliable alternative measure of natural capital. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that a dispute resolution process ought to be provided for and considers this could be provided for in Schedule 1 as set out in FFNZ's</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>'critical source management areas' AND AMEND PPC1 so the rules are focused on reducing impacts from intensive agriculture greater than 18su/ha rather than applying blanket rules to all extensive agriculture AND AMEND the Farm Environment Plan requirements so they are produced by the landowner with Waikato Regional Council guidance and support AND AMEND PPC1 so that there is flexibility in nitrogen leaching from hill country sheep and beef farming, and land uses which are low impact (at or below 20kgN/ha/yr for example or apply natural capital allocation) AND AMEND the timeframes to prepare Farm Environment Plans so they are set through consultation with the farmer taking into account the Waikato Regional Council subsidy available; the individual farmer's financial constraints; and the sensitivity of the waterbody to any impact.</p>		<p>submission on Variation 1.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP.</p> <p>FFNZ considers that the timeframes need to be amended to recognise the 2 year delay since notification of PC1 and ought to be reasonable.</p>
<p>A S Wilcox & Sons Ltd Submitter ID: 73142</p>	<p>PC1-4320</p>	<p>Rule 3.11.5.7</p>	<p>REMOVE the Non-complying Activity status of Rule 3.11.5.7 AND ADD a NEW Restricted Discretionary Activity rule that enables the use of land for new and additional commercial vegetable production where it can be demonstrated that the effects of the land use change will result in a</p>	<p>Support in part Oppose in part</p>	<p>FFNZ agrees the non-complying status is not appropriate. FFNZ supports the proposal that it is RDA but considers this ought to apply all activities and not just commercial vegetable growing (FFNZ refers to the reasons in its submission on Variation 1 about consistency in approach across all sectors).</p> <p>However, FFNZ does not agree that it ought to be a requirement that all contaminants decrease for</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			decrease in the discharges of nitrogen, phosphorus, sediment or microbial pathogens.		reasons including that the focus ought to be tailored and proportionate and focus on the contaminants at issue, and such an approach will likely result in significant cost for no net gain.
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6201	Rule 3.11.5.7	<p>ADD a NEW restricted discretionary activity Rule 3.11.5.7A as follows:</p> <p><u>"Rule 3.11.5.7A Restricted Discretionary activity rule - Land Use Change</u></p> <p><u>Notwithstanding any other rule in this Plan, in order to achieve a staged approach to change, any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā catchments, including in circumstances where the use of land included the ongoing conversion of land from production forestry to farming activity (including arable cropping), AND where the ongoing conversion of land from production forestry to farming activity was commenced prior to 1 June 2015 are restricted discretionary activities (requiring resource consent):</u></p> <p><u>1. Woody vegetation to farming activities; or</u></p> <p><u>2. Any livestock grazing other than dairy farming to dairy farming; or</u></p> <p><u>3. Arable cropping to dairy farming.</u></p> <p><u>Subject to the following standards and terms:</u></p> <p><u>a) The 5-year rolling average does</u></p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees the non-complying status is not appropriate. FFNZ supports the proposal that it is RDA but considers it ought to apply to any land use change, not just those that were occurring as at notification of PC1. This is for reasons including that FFNZ considers an effects based and consistent approach ought to be adopted and FFNZ refers further to its submission on Variation 1.</p> <p>FFNZ does not support retaining the non complying rule for all other activities and refers to the reasons set out in its submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>not exceed the Nitrogen Reference Point, or where Nitrogen Reference Point has not been calculated, the average nitrogen loss for the property or enterprise over the 5 year period ending 30 June of the preceding financial year that the application is made.</u></p> <p><u>b) Cattle, horses, deer and pigs are excluded from water bodies in accordance with Schedule C.</u></p> <p><u>Waikato Regional Council restricts its discretion over the following matters:</u></p> <p><u>i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</u></p> <p><u>ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</u></p> <p><u>iii. The need for and the content of a Farm Environment Plan.</u></p> <p><u>iv. The term of the resource consent.</u></p> <p><u>v. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</u></p> <p><u>vi. The time frame and circumstances under which the consent conditions may be reviewed."</u></p> <p><u>AND ADD a NEW restricted discretionary activity Rule 3.11.5.7B:</u></p> <p><u>"Rule 3.11.5.7B Restricted Discretionary activity rule - Land Use Change</u></p> <p><u>Notwithstanding any other rule in this</u></p>		

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			<p><u>Plan, in order to achieve a staged approach to change, any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares are restricted discretionary activities (requiring resource consent):</u></p> <ol style="list-style-type: none"> <u>1. Woody vegetation to farming activities; or</u> <u>2. Any livestock grazing other than dairy farming to dairy farming; or</u> <u>3. Arable cropping to dairy farming;</u> <u>4. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</u> <p><u>Subject to the following standards and terms:</u></p> <ol style="list-style-type: none"> <u>a) The 5-year rolling average does not exceed the Nitrogen Reference Point, or where Nitrogen Reference Point has not been calculated, the average nitrogen loss for the property or enterprise over the 5 year period ending 30 June of the preceding financial year that the application is made.</u> <u>b) Cattle, horses, deer and pigs are excluded from water bodies in accordance with Schedule C.</u> <p><u>Waikato Regional Council restricts its</u></p>		

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			<p><u>discretion over the following matters:</u></p> <ul style="list-style-type: none"> <u>i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</u> <u>ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</u> <u>iii. The need for and the content of a Farm Environment Plan, including the use of offset mitigation measures.</u> <u>iv. The term of the resource consent.</u> <u>v. The monitoring, record keeping, reporting, and information provision requirements for the holder of the resource consent.</u> <u>vi. The time frame and circumstances under which the consent conditions may be reviewed."</u> <p>AND AMEND Rule 3.11.5.7 as follows:</p> <p>Rule 3.11.5.7 - Non-complying activity rule - Land Use Change</p> <p><u>"The following activities which do not comply with the standards and terms of rule(s) 3.11.5.7A [or 3.11.5.7B] are non-complying activities:</u></p> <p><u>Changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares..."</u></p> <p>AND AMEND to include any appropriate or consequential</p>		

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			amendments to the rules set out above, or any other rule in PPC1 in order to address the reasons for submission and/or ensure drafting consistency.		
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11002	Rule 3.11.5.7	AMEND the notification section of Rule 3.11.5.7 to read: "Notification: Consent applications will be considered <u>without limited or public notification, and without the need to obtain written approval of affected persons, subject to the Council being satisfied that the loss of contaminants from the proposed land use will be lower than that from the existing land use.</u> "	Oppose	FFNZ considers that consents ought not to be notified and is concerned about the delay, cost and uncertainty notification would cause for no net benefit. FFNZ refers further to its submission on Variation 1.
Bailey, James Submitter ID: 73926	PC1-9024	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to replace the 'staged' approach with an 'Adaptive Management' approach to managing nitrogen and all contaminants AND AMEND PPC1 to recognise Land Use Suitability and Natural Capital as the basis of nitrogen management AND AMEND to enable transition toward the Vision and Strategy with Land Use Suitability as a starting point and using Adaptive Management as our understanding develops, reviewing and adapting through subsequent plan changes. AND DELETE the Rule 3.11.5.7 requirement to manage property level discharges to a Nitrogen Reference Point based on historic profiles	Support in part Oppose in part	In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available. FFNZ considers that LUS and natural capital are not sufficiently developed to provide a basis for nitrogen management. FFNZ does not support allocation of nitrogen or LUC as a basis for allocation. FFNZ considers there ought to be a transition to achieving the Vision & Strategy and that achieving the Vision & Strategy does not require the adoption of 80 year targets in this plan change. FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND PPC1 to apply Land Use Suitability and Natural Capital now by including allocation based on the Natural Capital of soils through a Land Use Capability approach</p> <p>AND AMEND to provide a flexibility cap for low leaching farm systems below a certain threshold (20kg/N/ha/yr) that is deemed as a sustainable level for the transition period, with farmers with a Nitrogen Reference Point below this enabled to increase up to this point.</p>		<p>provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ supports flexibility for low nitrogen discharges to increase but is not sure that 20kgN is the appropriate threshold. FFNZ would support it if it was supported by a robust section 32 assessment.</p>
<p>Beef + Lamb New Zealand Limited Submitter ID: 73369</p>	<p>PC1-11505</p>	<p>Rule 3.11.5.7</p>	<p>AMEND Rule 3.11.5.7 so that the Rule does not apply to land use change where it does not exceed the sustainable Nitrogen discharge threshold (or limit) for the sub-catchment, or stocking rates.</p> <p>AND AMEND so that there is the requirement where the change in land use results in discharges in exceedance of the sustainable discharge level, that those discharges have to be reduced overtime, and may not exceed the 50th percentile for that catchment.</p>	<p>Oppose</p>	<p>FFNZ does not support allocation for reasons including there is no reliable or equitable way to allocate and allocation is likely to result in significant cost for no net benefit. FFNZ opposes the submitter's proposal for thresholds on the basis that it is an allocation approach. FFNZ also opposes the stocking rate proposal for reasons including that this is an inflexible and untailed input control approach that will likely result in significant cost for no net gain. FFNZ considers that a tailored and proportionate FEP approach ought to be adopted, with land use change provided for as a discretionary activity with appropriate policy support and FFNZ refers to its submission on Variation 1.</p> <p>FFNZ opposes the 50th percentile (and/or sustainable discharge or sustainable limits or similar) proposal for reasons including that is</p>

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					arbitrary, does not take into account particular circumstances (e.g. a farm enterprise on pumice soils with high rainfall may have a high nitrogen number but good farm systems and practices and the opposite might be the case for a farm on heavier soils and lower rainfall), will likely impose significant cost for no net benefit and will likely result in the desired water quality outcomes either being over achieved or have no correlation with them.
Chhagn Bros Co Ltd Submitter ID: 73762	PC1-5596	Rule 3.11.5.7	AMEND PPC1 by adding a new restricted discretionary activity rule that enables the use of land for new and additional commercial vegetable production where the effects of the land use change can demonstrate that there will be a decrease in the discharges of nitrogen, phosphorus, sediment or microbial pathogens as a result of the land use change.	Support in part Oppose in part	FFNZ agrees the non-complying status is not appropriate. FFNZ supports the proposal that it is RDA but considers this ought to apply all activities and not just commercial vegetable growing (FFNZ refers to the reasons in its submission on Variation 1 about consistency in approach across all sectors). However, FFNZ does not agree that it ought to be a requirement that all contaminants decrease for reasons including that the focus ought to be tailored and proportionate and focus on the contaminants at issue, and such an approach will likely result in significant cost for no net gain.
Clements, Robyn Ethel Submitter ID: 73097	PC1-7753	Rule 3.11.5.7	DELETE Rule 3.11.5.7 in its entirety OR AMEND Rule 3.11.5.7 by substituting to individual Farm Environment Plans instead of the OVERSEER Model to determine land use capability and individual farm base discharge allowance. AND AMEND to provide Nitrogen Reference Point grant credits to farms where evidence farming practices have been environmentally active to reduce use of nitrogen and other potential contaminants.	Support in part Oppose in part	FFNZ considers that Rule 7 ought to be significantly amended to be a discretionary activity rule with appropriate policy support and information requirements (see FFNZ's submission on Variation 1). FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models,

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			<p>AND AMEND Nitrogen Reference Points to recognise historic lower use of Nitrogen by beef and sheep farms to dairy and allow prescribed favourable variation for that farm type.</p> <p>OR AMEND to ensure provision is made for method that looks at land use capability to assess land.</p> <p>AND MAKE any consequential amendments</p>		<p>changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ considers that the submitter's concerns are better addressed by the amendments it proposed in its submission on Variation 1.</p>
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10802	Rule 3.11.5.7	DELETE Rule 3.11.5.7. IF Rule 3.11.5.7 is not deleted, RETAIN the expiry date.	Support in part Oppose in part	<p>FFNZ considers that Rule 7 ought to be significantly amended to be a discretionary activity rule with appropriate policy support and information requirements (see FFNZ's submission on Variation 1). In the alternative, and in the event that FFNZ's proposal is not successful, FFNZ agrees the rule ought to be deleted.</p> <p>FFNZ does not support retaining the expiry date because it is not clear how this would influence consent applications or what the activity status would be post 1 July 2026 (see further reasons in FFNZ submission on Variation 1).</p>
Cotman, Jim Submitter ID: 59884	PC1-4879	Rule 3.11.5.7	Rule 3.11.5.7: WITHDRAW PPC1 and REPLACE it with a new plan that endorses 'Best Practical Options' that are developed by landowners	Support in part	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However,

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			<p>AND AMEND to provide a new plan that supports the development and implementation of Catchment Management Plans that are led by landowners</p> <p>AND ENSURE this new plan supports identifying potential critical source contaminant pathways on a sub-catchment basis to provide quantifiable measures and factual information into consideration Catchment Management Plans</p> <p>AND ENSURE this new plan encourages innovative new science that can provide alternative means to managing water quality</p> <p>AND ENSURE the new plan recognises that well informed landowners as stewards of their land are the best and only people who can create action on the ground</p> <p>AND ENSURE the new plan approach favours a 'shared values' approach where all parties work toward achieving sensible water quality targets.</p> <p>AND ENSURE that the primary focus of the new plan is a comprehensive programme to eliminate Koi Carp along with the native species predator, catfish.</p> <p>AND ENSURE that the new plan addresses the adverse effects of the Weir, Department of Conservation, and Fish and Game placed in the</p>		<p>FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans. However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate. FFNZ agrees that robust science and information is required over the lifetime of this plan.</p> <p>FFNZ agrees that landowners ought to be involved in the preparation of FEPs and in the development of mitigations.</p> <p>FFNZ considers that a rules framework is needed but that this ought to provide a reasonable consenting or permitted activity pathway as proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ agrees that koi carp need to be addressed and that the focus ought to be on all sources of contaminants, not just diffuse discharges from farming activities.</p> <p>FFNZ agrees that all sources of contaminants ought to be considered including the potential effects of the DOC and Fish & Game weir.</p>

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			Whangamarino Stream AND AMEND PPC1 with a new plan where the primary sector is encouraged to grow and contribute to the regional economy (in a sustainable way).		
DairyNZ Submitter ID: 74050	PC1-10247	Rule 3.11.5.7	ADD an advice note to Rule 3.11.5.7 to read: "Advice note: Changes in land use described above where the resulting land use will not increase diffuse discharges of contaminant, (including that they do not exceed the property or enterprise's Nitrogen Reference Point), will generally be granted. This will be able to be established at the time that the farm or enterprise has completed a Farm Environment Plan and are managing within their Nitrogen Reference Point."	Oppose	FFNZ does not support an approach that only grants consent for land use change if all contaminants decrease. This is for reasons including that it is not sufficiently tailored to contaminants at issue, will likely result in significant cost for no net benefit and as otherwise opposed in FFNZ's submission on Variation 1.
Department of Conservation Submitter ID: 71759	PC1-11059	Rule 3.11.5.7	RETAIN Rule 3.11.5.7 with stronger policy guidance to support its use. ALTERNATIVELY, CONSIDER a prohibited activity rule to replace Rule 3.11.5.7, as a mechanism to avoid adverse effects of land use change on water quality.	Oppose	Rule 7 is likely to result in significant cost for no net benefit. FFNZ considers that the likely implication of the policies is that land use change that does not result in all contaminants reducing will likely be prohibited. FFNZ opposes this approach and considers that amendments are required including a discretionary activity status for land use change and appropriate policy support. FFNZ refers further to its submission on Variation 1. Accordingly, FFNZ strongly opposes the proposal to make Rule 7 stronger or to consider a prohibited activity rule.
Farmers 4 Positive Change (F4PC)	PC1-10434	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to use Farm Environment Plans as a tool to	Support in part	FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73355			understand land use suitability and manage contaminant loss AND AMEND to include a range of actions in Farm Environment Plans, such as avoid farming older cattle on slopes in winter or when wet; farm cattle extensively on slopes; fence off swamps and plant out to provide silt traps to remove sediment; construct sediment traps near the headwaters to help slow flow and trap sediment; plant shade trees away from waterways to discourage stock camps and nutrient build-up; use temporary electric fencing where and when necessary; plant poplar poles on erosion prone slopes; identify suitable units for planting pines at farmer discretion; fence off waterways on more intensively farmed areas of the farm and provide reticulated water for stock.	Oppose in part	assessment and applying the MPA framework set out in FFNZ's submission on Variation 1. FFNZ has concerns about the submitter's proposal to use FEPS to understand land use suitability and would oppose such a proposal if it involved allocating contaminants or was used in a regulatory context to require land use change or specify what activities could occur. FFNZ considers that FEPs ought to be sufficiently flexible to consider a range of mitigations (guided by FFNZ's MPA framework) and if the suggestion is to list the potential mitigations FFNZ would oppose such an approach because it considers that there needs to be sufficient flexibility and tailoring to the specific situation.
FarmRight Submitter ID: 73720	PC1-5403	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to separate into three new rules, setting out: 1. Land use changes which decrease nutrient loss will be a controlled activity; 2. Land use changes which are neutral in relation to nutrient loss will be a restricted discretionary activity; 3. Land use changes which increase nutrient loss will be a non-complying activity.	Oppose	FFNZ does not support an approach that treats land use proposals that do not reduce all contaminants as non complying. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. Therefore FFNZ opposes the proposal to separate Rule 7 into three rules and considers that land use change ought to be considered as a single discretionary rule.

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Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10632	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to be a discretionary activity.	Support	FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10513	Rule 3.11.5.7	DELETE Rule 3.11.5.7 and REPLACE with a Rule that reads: <u>"Rule 3.11.5.7 – Non-complying Activity Rule – The use of land for farming activities and land use change</u> <u>The following activities are non-complying activities (requiring resource consent):</u> <u>1. The use of land for farming activities and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water; and</u> <u>2. Any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise location in the Waikato and Waipā catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares:</u> <u>i. Woody vegetation to farming activities; or</u> <u>ii. Any livestock grazing other than dairy farming to dairy farming; or</u> <u>iii. Arable cropping to dairy farming;</u> <u>or</u> <u>iv. Any land use to commercial</u>	Oppose	FFNZ does not support an approach that treats land use proposals that do not reduce all contaminants as non complying. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. FFNZ opposes the submitter's proposal and its concerns include that it will likely result in significant cost for no net benefit.

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			<p><u>vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</u> <u>That do not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 and is not a discretionary activity under Rule 3.11.5.6...</u>" AND AMEND PPC1 as necessary to clarify that land use change within a property or enterprise (>4.1 ha) that does not increase the total area within that property devoted to that land use beyond 4.1 hectares is not caught by this rule.</p>		
Fonterra Shareholders Council Submitter ID: 72610	PC1-10644	Rule 3.11.5.7	<p>DELETE Rule 3.11.5.7 and replace with the following: <u>"Rule 3.11.5.7 – Non-complying Activity Rule – The use of land for farming activities and land use change</u> <u>The following activities are non-complying activities (requiring resource consent):</u> 1. <u>The use of land for farming activities and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water; and</u> 2. <u>Any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the</u></p>	Oppose	<p>FFNZ does not support an approach that treats land use proposals that do not reduce all contaminants as non complying. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ opposes the submitter's proposal and its concerns include that it will likely result in significant cost for no net benefit.</p>

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			<p><u>Waikato and Waipā catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares:</u></p> <p><u>i. Woody vegetation to farming activities; or</u></p> <p><u>ii. Any livestock grazing other than dairy farming to dairy farming; or</u></p> <p><u>iii. Arable cropping to dairy farming;</u></p> <p><u>or</u></p> <p><u>iv. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5 that do not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 and is not a discretionary activity under Rule 3.11.5.6."</u></p> <p>AND MAKE other amendments as necessary to clarify that land use change within a property or enterprise (>4.1 hectares) that does not increase the total area within that property devoted to that land use beyond 4.1 hectares is not caught by this rule.</p>		
Franklin Waikato Drainage Advisory Subcommittee Submitter ID: 74092	PC1-4065	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to provide the same flexibility and supported approach to enthusiastic young farmers that is extended to tangata whenua in Chapter 3.11.	Support in part	FFNZ considers that the rules ought to be effects based and not ownership based. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.
Gavins Limited Submitter ID: 73846	PC1-5487	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to read: "...subject to the Council being satisfied that the loss of contaminants	Oppose	FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change,

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			from the proposed land use will be <u>the same or</u> lower than that from the existing land use."		policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase. Therefore it opposes the proposed amendment to add the word "same" because it considers it does not go far enough.
Genetic Technologies Ltd Submitter ID: 73953	PC1-3276	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to ensure that land use change is a permitted activity if the proposed change in land use results in: nitrogen loss being below the 75th percentile Nitrogen Reference Point, and lower than the Nitrogen Reference Point for the previous use; phosphorus and other soil contaminant (E.coli and other pathogens) losses are all lower than the previous land use; all waterways are fenced more than 3 metres from the waterway margin; and all stock are excluded immediately.	Oppose	FFNZ considers that Rule 7 ought to be a RDA or discretionary activity. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase. FFNZ does not support making this a permitted activity for reasons including that it does not appear to appropriately control adverse effects and it is not clear how the matters the submitter refers to would adequately control adverse effects.
Gleeson, Graeme B Submitter ID: 73800	PC1-6452	Rule 3.11.5.7	DELETE Rule 3.11.5.7.	Support in part	FFNZ agrees that a non complying activity status is not appropriate but FFNZ considers that an activity status needs to be provided for if Rule 7 is deleted as the submitter proposes. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.
Glenshee Trust	PC1-1877	Rule 3.11.5.7	AMEND 3.11.5.7 if the use of the	Support in	FFNZ considers that the NRP ought to be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73028			<p>Nitrogen Reference Point is continued, consider using long term averaging of nitrogen losses. This provides more ability to cope with yearly changes that frequently occur within biological systems</p> <p>AND AMEND by giving further consideration to alternative tools such as the use of the natural capital approach</p> <p>AND AMEND by utilising tools such as Farm Menus developed by Waikato Regional Council as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model</p> <p>AND AMEND where Overseer is to be used as part of the creation of solutions then the calculations must be used as a guide only and the focus to be on the trends used</p> <p>AND AMEND Rule 3.11.5.7 land use change provisions to recognise that focus must remain on controlling losses from land based activities but this should not be by a broad brush approach of limiting land use change AND AMEND so that any land use change should be limited by an appropriate means of gauging a best practice approach to managing losses rather than limiting change full stop</p>	<p>part</p> <p>Oppose in part</p>	<p>calculated on a five year rolling average for reasons including that flexibility is needed e.g. during drought which may increase nitrogen if stock are not able to be sold (see FFNZ's submission on Variation 1).</p> <p>In principle, FFNZ acknowledges that LUC could be used as a on farm decision support tool used as one of a range of tools to help identify critical source areas and assess mitigations. However, FFNZ considers that it is not a proxy for nitrogen or a basis for allocation and considers that there is no suitable proxy for "natural capital." FFNZ considers that a more appropriate way to manage nitrogen (and other contaminants) is through tailored and proportionate FEPs with critical source areas identified and mitigations assessed using FFNZ's MPA framework (FFNZ refers further to its submission on Variation 1).</p> <p>FFNZ supports a "farm menu" type approach and considers that its MPA framework provides for a similar assessment.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND Rule 3.11.5.7 Farm Environment Plan provisions by providing an industry wide capability assessment to assess who will complete Farm Environment Plans</p> <p>AND AMEND Farm Environment Plan provisions to showing land owners and the industry how these are to be constructed and how the gains are quantified</p> <p>AND AMEND by providing clarity as to how the monitoring of Farm Environment Plans will be undertaken and who will pay for this before land owners commitment to this.</p>		<p>standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ agrees that there will likely be a shortage in CFEPs and considers that provision for that e.g. industry wide capability, ought to be provided for.</p> <p>FFNZ is concerned that by amending the FEP provisions to show landowners and industry how they can be constructed will result in them becoming too rigid and not sufficiently tailored. FFNZ considers that this could be addressed through guidance documents provided they were sufficiently flexible.</p>
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5782	Rule 3.11.5.7	DELETE Rule 3.11.5.7 AND REPLACE it with Best Practicable Option based rules that require those causing the adverse effects associated with their activities to avoid, remedy or mitigate those activities.	Oppose	<p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. FFNZ proposes that these MPA factors are taken into account in the policy support and information requirements.</p> <p>However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc.</p>
Hill Country Farmers Group	PC1-7877	Rule 3.11.5.7	DELETE Rule 3.11.5.7 AND AMEND to enable change in	Oppose in part	FFNZ considers that Rule 7 ought to be a RDA or discretionary activity.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73321			land use in sub-catchments that meet Table 3.11-1 attribute targets as a Permitted Activity AND ADD a NEW Restricted Discretionary Activity consent to manage change in land use in high priority sub-catchments.		<p>FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.</p> <p>FFNZ does not support making this a permitted activity for reasons including that it does not appear to appropriately control adverse effects and it is not clear how the matters the submitter refers to would adequately control adverse effects.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate and/or determine land use change.</p>
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10169	Rule 3.11.5.7	AMEND Rule 3.11.5.7(4) to read: "4. Any land use to commercial vegetable production <u>that cannot be provided for through Rule 3.11.5.5, 3.11.5.6(b), or 3.11.5.X</u> except as provided for under standard and term g. of Rule 3.11.5.5" Or AMEND Rule 3.11.5.7 (4) to read: "4. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5, 3.11.5.6 b, or	Oppose	<p>FFNZ considers that a non complying activity status is not appropriate. This submission point does not change that so FFNZ opposes it.</p> <p>FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.</p>

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			3.11.5.X”		
Jivan Produce Ltd Submitter ID: 71429	PC1-1361	Rule 3.11.5.7	DELETE Rule 3.11.5.7 AND REMOVE Land Use Change restrictions for those sub-catchments that meet the attribute targets set in Table 3.11-1 AND ADD a restricted discretionary activity consent requirement for those changes in land use to occur in sub-catchments that are unable to meet the attribute targets set in Table 3.11-1.	Support in part Oppose in part	FFNZ considers that a non complying activity status is not appropriate. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ’s submission on Variation 1. That means providing for situations where contaminants may increase. FFNZ does not support the 80 year targets and refers to the reasons in its submission on Variation 1. Therefore FFNZ does not agree that land use change ought to be based on the sub-catchment targets in Table 3.11-1.
JN & VL Gilbert Family Trust Submitter ID: 73578	PC1-10309	Rule 3.11.5.7	DELETE Rule 3.11.5.7 AND AMEND PPC1 to gauge land capability through the Farm Environment Plan process REMOVE the Nitrogen Reference Point and the use of OVERSEER from PPC1 AND AMEND PPC1 provisions to be effects- and science-based and not based on grandparenting (of leaching rates, stocking rates or land use) AND AMEND to adopt a sub-catchment approach to address contaminants that are relevant to each farm as identified by science.	Support in part Oppose in part	FFNZ considers that a non complying activity status is not appropriate so in that respect agrees that it ought to be deleted but considers it ought to be replaced with a RD or discretionary activity rule. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ’s submission on Variation 1. That means providing for situations where contaminants may increase. FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models,

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p>
Loader, A J Submitter ID: 74084	PC1-7447	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to enable land use change in sub-catchments that meet Table 3.11-1 targets as a Permitted Activity. AND ADD a NEW Restricted Discretionary Activity consent to manage change in land use in high priority sub-catchments. AND REMOVE Non-Complying land use change rule from PPC1.	Support in part Oppose in part	<p>FFNZ considers that a non complying activity status is not appropriate. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.</p> <p>FFNZ does not support the 80 year targets and refers to the reasons in its submission on Variation 1. Therefore FFNZ does not agree that land use change ought to be based on the sub-catchment targets in Table 3.11-1. FFNZ also considers that a permitted activity status is unlikely to provide for sufficient consideration of any adverse effects.</p>

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Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9354	Rule 3.11.5.7	RETAIN Rule 3.11.5.7.	Oppose	FFNZ oppose the non complying activity status of Rule 7. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.
Matamata-Piako District Council Submitter ID: 73419	PC1-3703	Rule 3.11.5.7	CONSIDER a review with respect to Rule 3.11.5.7, the reasons for the adoption of this approach and the justification under section 32 regarding the efficiency and effectiveness of this method and rule. AND AMEND to provide for the Land Use Change Rule to be at least (meaning no more restrictive than) Discretionary Activity. AND ENSURE collaboration with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes. OR DELETE Rule 3.11.5.7 and CONSIDER an allocation approach with rules and performance standards to manage nutrient discharges and water quality base on landuse classes.	Support in part Oppose in part	<p>FFNZ is also concerned that the social and economic costs associated with Rule 7 are likely to be significant and are likely to severely impact on the section 32 assessment.</p> <p>FFNZ agrees that land use change ought to be no more restrictive than a discretionary rule. FFNZ considers that there also ought to be policy support (e.g. Policy 6 as amended in FFNZ' submission on Variation 1) and information requirements for clarity about how applications for land use change consents will be assessed (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees with collaboration with sector groups and communities and refers to the changes it sees to the methods in its submission on Variation 1.</p> <p>FFNZ does not support allocation (see its submissions on PC1 and Variation 1). FFNZ considers it is premature to allocate or to signal that it is necessary. FFNZ considers that nitrogen and other contaminants can be more appropriately managed through the framework it proposes in Variation 1 e.g. FEPs based on MPA, using the NRP as a trigger point to assess different increases in nitrogen etc.</p> <p>Accordingly FFNZ considers that any references to</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					allocation ought to be deleted and does not agree with the proposal for allocation and performance standards to manage nutrient discharges based on land use classes.
Matira Sub Catchment Group Submitter ID: 74148	PC1-9305	Rule 3.11.5.7	DELETE Rule 3.11.5.7 in its entirety OR AMEND to provide a land use suitability and a sub-catchment method that would work better.	Support in part Oppose in part	<p>FFNZ opposes the non complying activity status of Rule 7. Deleting this rule would address this but FFNZ considers that land use change then needs to be provided for as a RD or discretionary activity.</p> <p>FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support a LUS approach or allocation to sub-catchments for reasons including that LUS is not well defined, allocation is premature and is likely to result in significant cost for not net benefit and as otherwise opposed in FFNZ's submissions on PC1 and Variation 1.</p>
Moss, George Wilder Submitter ID: 74078	PC1-11073	Rule 3.11.5.7	RETAIN Rule 3.11.5.7 as a non-complying activity AND AMEND to provide guidance that consent should be granted for enterprises that can demonstrate that no increase to contaminants and/or reduction in the values attributed to the water ways is going to occur through the land use change.	Oppose	<p>FFNZ opposes the non complying activity status of Rule 7. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ is concerned that on the basis of the wording of the policies consent is unlikely to be granted for land use change unless all contaminants reduce and this is not appropriate.</p>
Nelson Farms Partnership Submitter ID:	PC1-8757	Rule 3.11.5.7	DELETE the Nitrogen Reference Point from PPC1 AND DELETE the use of the	Support in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
73054			<p>OVERSEER Model from PPC1 AND AMEND to adopt a sub-catchment approach to addressing contaminants relevant to each farm AND AMEND so that, if nitrogen discharges do have to be allocated, the allocation system is based on the natural capital of soils and the water quality outcomes for each sub-catchment</p> <p>AND REMOVE allocation based on 2014/15 or 2015/16 land use or grandparenting, especially for lower leaching land uses such as drystock AND AMEND to use Farm Environment Plans to determine what works best for each farm, science to determine which contaminants are an issue in each sub-catchment, and effects-based provisions</p> <p>AND AMEND to reconsider the use of Overseer modelled nitrogen discharge numbers to determine resource consent status and compliance</p> <p>AND AMEND Rule 3.11.5.7 to include consideration of the amount of the proposed land use change discharges compared to existing discharges in the sub-catchment and consideration of the level of water quality improvement needed in the sub-catchment</p> <p>AND AMEND to include a base allowable discharge for the sub-</p>	Oppose in part	<p>farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average, the benchmarking years are extended and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ also considers that there is no reliable proxy for natural capital and that it is not appropriate to allocate on this basis.</p> <p>FFNZ considers that land use change applications ought to be considered on their merits and the context of the MPA framework FFNZ proposes in its submission on Variation 1 (which does include proportionality and characteristics of sub-catchment) and not relative existing discharges.</p> <p>FFNZ oppose the proposal for “base allowable discharges for sub-catchments” for reasons including that this would involve allocation, would likely be based on the 80 year targets (which FFNZ</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>catchment based on total discharges in the catchment and the level of improvement needed to meet short and long term targets AND AMEND the Rule 3.11.5.7 Farm Environment Plan requirements to reduce the thresholds for mandatory stock exclusion to nationally recommended standards (Clean Water Report, February 2017, with stock exclusion only applying to slopes of up to 15 degrees for deer and cattle, and only applying to waterbodies 1m or wider for cattle and deer on land between 3 and 15 degrees slope AND RETAIN the requirement for fencing on land above 15 degrees for intensive farming operations (>18su/ha) AND REPLACE input standards such as riparian setbacks and limitation on cultivation with mitigations that are set on a farm by farm basis and focused on management of critical source areas AND AMEND to focus on reducing impacts from intensive agriculture (>18su/ha) rather than applying inappropriate rules to extensive agriculture AND AMEND to allow landowners to produce their own Farm Environment Plans with guidance and support from Waikato Regional Council</p>		<p>does not support), be arbitrary and impose significant cost.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.</p> <p>Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND DELETE Nitrogen Reference Point discharge restrictions and enable flexibility in nitrogen leaching from hill country sheep and beef farming and low impact land uses (< 20kgN/ha/yr) or apply a natural capital allocation AND DELETE the timeframes and set individual timeframes based on consultation with landowners and the sensitivity of the waterbody.		
New Zealand Forest Owners Association Inc Submitter ID: 73524	PC1-9962	Rule 3.11.5.7	DELETE Rule 3.11.5.7. AND REPLACE it with robust Best Practical Option based rules that require those causing the adverse effects associated with their activities to avoid, remedy or mitigate those activities. AND make any consequential amendments.	Oppose	While FFNZ considers that Rule 7 ought to be significantly amended so that it is not noncomplying (and so there is appropriate policy support and information requirements for land use change, as set out in FFNZ's submission on Variation 1), FFNZ does not support replacing this with BPO rules as proposed by this submitter. In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc.
New Zealand Institute of Forestry Submitter ID: 74142	PC1-9866	Rule 3.11.5.7	DELETE Rule 3.11.5.7 and any consequential amendments, including any such changes to the Plan as to incentivise the shift to forestry (in all its forms) and other land uses which reduce the adverse effects of land use on the region's water quality.	Support in part	FFNZ considers that a non complying activity status is not appropriate but FFNZ considers that an activity status needs to be provided for if Rule 7 is deleted as the submitter proposes. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change,

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4646	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to have a different consent activity pathway.	Support	FFNZ agrees that a non complying activity status is not appropriate. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11863	Rule 3.11.5.7	RETAIN Rule 3.11.5.7.	Oppose	FFNZ opposes the non complying activity status of Rule 7. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.
Ngati Haua Tribal Trust Submitter ID: 73025	PC1-1974	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to provide for the long term averaging of nitrogen losses AND AMEND to include alternative tools such as the use of the natural capital approach AND AMEND by utilising tools such as MENUs as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model AND AMEND where Overseer is to be used as part of the creation of solutions, calculations must be used	Support in part Oppose in part	FFNZ considers that a non complying activity status is not appropriate. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase. FFNZ agrees with the proposal to provide for a long term average approach for nitrogen losses. FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>as a guide only and the focus to be on the trends that are used. AND AMEND to address the implications of stock exclusion on steeper and more extensive hill country AND AMEND by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority AND AMEND to consider alternative solutions on steep land such as water reticulation installation AND AMEND to match land use capability rather than directly to slope AND CONSIDER undertaking an industry wide capability assessment to assess who will complete the Farm Environment Plans. AND AMEND to show land owners and the industry how Farm Environment Plans are to be constructed and how the gains are quantified AND CLARIFY how the monitoring of these plans will be undertaken and who will pay for this.</p>		<p>support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ also considers that there is no reliable proxy for natural capital and that it is not appropriate to allocate on this basis.</p> <p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models (including the MENUs approach the submitter proposes), changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>FEP and tailored to the particular situation (including the alternatives for hill country farmers proposed by this submitter).</p> <p>FFNZ considers that a reasonable and pragmatic approach is required for monitoring and enforcement and does not support an approach based on micro management of FEP actions and considers that sufficient flexibility ought to be provided (see FFNZ's submission on Variation 1).</p>
<p>Oji Fibre Solutions (NZ) Limited Submitter ID: 73725</p>	<p>PC1-8716</p>	<p>Rule 3.11.5.7</p>	<p>DELETE Rule 3.11.5.7 OR AMEND to make changes as appropriate to reflect the reasons for the submission including: AND OR the alternative approach proposed in the submission [overview in Table 2 of the submission - Rule 7]. IF the rule is retained then AMEND the notification provision to read: "Consent applications will be considered without notification, and without the need to obtain written approval of affected persons subject to the Council being satisfied that the loss of contaminants from the proposed land use will be lower than that from the existing land use." AND AMEND so that land use change is a restricted discretionary activity, discretion is restricted to the implementation of Best Practicable Option and applicable to other farming activities OR AMEND Rules to incorporate Best Practicable</p>	<p>Oppose</p>	<p>FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.</p> <p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc.</p>

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			Option for new farming activities into the permitted activity rules.		
Open Country Dairy Submitter ID: 74182	PC1-5422	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to allow for a review by Waikato Regional Council panel of experts of individual cases to deem land use to be continuous farming activity.	Support in part Oppose in part	FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. FFNZ considers that the submitter's proposal goes far enough and considers that more substantive amendments are required.
Perfect Produce Co Ltd Submitter ID: 72488	PC1-4199	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to provide for the development of a new restricted discretionary activity rule that enables the use of land for new and additional commercial vegetable production where the effects of the land use change can demonstrate that there will be a decrease in the discharges of nitrogen, phosphorous, sediment or microbial pathogens as a result of the land use change.	Support in part Oppose in part	FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. FFNZ considers that the submitter's proposal needs to provide for all activities (not just commercial vegetable growing) and should not require a decrease in all discharges.
Perrin Ag Consultants Ltd Submitter ID: 73859	PC1-3394	Rule 3.11.5.7	AMEND Rule 3.11.5.7 so that land use change becomes a controlled activity under Rules 3.11.5.3 through to 3.11.5.5 from July 2019 (or the point at which Nitrogen Reference Points have been established) provided land use change does not result in nitrogen leaching above the Nitrogen Reference Point.	Support in part	FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. To the extent that the submitter's proposal achieves that, FFNZ supports it. However it considers that it should provide for nitrogen to increase through a discretionary activity rule as proposed in FFNZ's submission on Variation 1.
Pinnell, Graham Submitter ID:	PC1-4421	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to shorten the sunset date to 1 July 2021.	Oppose in part	FFNZ considers that a reasonable consenting framework ought to be provided through a

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
74007			AND AMEND to clarify that the last part of the sentence under the Notification heading ('subject to the Council being satisfied that the loss of contaminants from the proposed land use will be lower than from the existing land use') applies to resource consent conditions only, rather than as a notification requirement. AND AMEND to clarify that off-site mitigation in the same sub-catchment is permissible to offset the assessed increase in contaminant discharge from land use intensification.		discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. FFNZ considers that changing the sunset date to 2021 will result in uncertainty and does not address the need to provide for reasonable land use change. FFNZ agrees that off site mitigation and offsets ought to be able to be considered.
Primary Land Users Group Submitter ID: 71427	PC1-11179	Rule 3.11.5.7	DELETE Rule 3.11.5.7 AND AMEND PPC1 to enable change in land use in sub-catchments that meet Table 3.11-1 attribute targets as a permitted activity AND AMEND to introduce a new restricted discretionary activity consent to manage change in land use in high priority sub-catchments by adoption of applicable Best Practicable Option management innovation.	Support in part Oppose in part	FFNZ agrees that a non complying activity status is not appropriate but FFNZ considers that an activity status needs to be provided for if Rule 7 is deleted as the submitter proposes. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase. FFNZ does not support the 80 year targets in Table 3.11-1 so does not support the proposal to allow activities that meet those as a permitted activity but would support a RDA rule provided that the proposal around BPO is based on a similar framework to FFNZ's MPA framework (see FFNZ's submission on Variation 1) and not on input controls as some submitters have proposed.

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Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7806	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to lower the consent status to Restricted Discretionary Activity.	Support	<p>FFNZ agrees that a non complying activity status is not appropriate but FFNZ considers that an activity status needs to be provided for if Rule 7 is deleted as the submitter proposes.</p> <p>FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.</p> <p>For these reasons, FFNZ agrees with the proposal for an RDA status.</p>
Raukawa Charitable Trust Submitter ID: 74073	PC1-10575	Rule 3.11.5.7	RETAIN Rule 3.11.5.7.	Oppose	<p>FFNZ opposes the non complying activity status of Rule 7. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.</p>
Ravensdown Limited Submitter ID: 74058	PC1-10161	Rule 3.11.5.7	AMEND Rule 3.11.5.7 as follows: "Rule 3.11.5.7 – Non-complying Activity – Land Use Change Notwithstanding any other rules in this Plan, and of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato or Waipā catchments, where prior to 1 July 2026 the change exceeds 4.1 hectares <u>and there is an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial</u>	Oppose in part	<p>FFNZ considers that a non complying activity status is not appropriate. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.</p> <p>Notwithstanding this, FFNZ sees merit in the submitter's proposal to link increases of contaminants with deterioration in water quality and would support such a proposal as an alternative if the amendments FFNZ seeks are not successful.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>pathogens which will potentially result in deterioration of water quality."</u>		
Rayonier Matariki Forests Submitter ID: 73159	PC1-9581	Rule 3.11.5.7	DELETE Rule 3.11.5.7.	Support in part	<p>FFNZ agrees that a non complying activity status is not appropriate but FFNZ considers that an activity status needs to be provided for if Rule 7 is deleted as the submitter proposes.</p> <p>FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.</p>
Rotorua Lakes Council Submitter ID: 73373	PC1-2522	Rule 3.11.5.7	<p>REPLACE Rule 3.11.5.7 with a rule that specifies land use changes listed are a discretionary activity with specific criteria to measure applications against including whether the loss of contaminants will be the same or lower than the existing land use.</p> <p>AMEND Rule 3.11.5.7 and the associated definitions to make it clear how horticulture/ viticulture and intensive outdoor animal rearing are covered by the rule.</p> <p>AND AMEND by providing an explanation of how the rule is to be administrated where there is a mix of varied land use changes within the same property or enterprise.</p> <p>AND ANY consequential amendments.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that a non complying activity status is not appropriate. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.</p> <p>FFNZ does not support the proposed requirement for discharges to be the same or lower and considers that the assessment ought to be guided by FFNZ's MPA framework (see FFNZ's submission on Variation 1).</p> <p>In principle FFNZ supports clarity around definitions of intensive land uses as requested but this is on the basis that reasonable and appropriate definitions are used and that they reflect the changes requested or address the issues raised in</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					FFNZ's submission on Variation 1.
Southern Fresh Foods Ltd Submitter ID: 71408	PC1-1208	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to provide for new land usage for commercial vegetable production as a restricted discretionary activity if it can be demonstrated there will be no increases in discharges. AND DELETE the reference to a non-complying activity and the requirement of a resource consent.	Support in part Oppose in part	FFNZ considers that a non complying activity status is not appropriate. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase. However, FFNZ considers that the proposed RDA rule apply to all farming activities (not just commercial vegetable growing) and there should be no requirement that the discharges are the same or less.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11192	Rule 3.11.5.7	AMEND existing Rule 3.11.5.7 to read: <u>"The following activities which do not comply with the standards and terms of rule(s) 3.11.5.7A are non-complying activities:</u> <u>Changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā catchments where prior to 1 July 2026 the change exceeds a total of 4.1 hectares..."</u> ADD a NEW restricted discretionary activity rule to read: <u>"Rule 3.11.5.7A Restricted Discretionary Activity Rule- Land Use Change</u> <u>Notwithstanding any other rule in this Plan, in order to achieve a staged</u>	Support in part Oppose in part	FFNZ agrees the non-complying status is not appropriate. FFNZ supports the proposal that it is RDA but considers it ought to apply to any land use change, not just those that were occurring as at notification of PC1. This is for reasons including that FFNZ considers an effects based and consistent approach ought to be adopted and FFNZ refers further to its submission on Variation 1. FFNZ does not support retaining the non complying rule for all other activities and refers to the reasons set out in its submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>approach to change, any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā Catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares is a Restricted Discretionary Activity (requiring resource consent):</u></p> <ol style="list-style-type: none"> <u>1. Woody vegetation to farming activities; or</u> <u>2. Any livestock grazing other than dairy farming to dairy farming; or</u> <u>3. Arable cropping to dairy farming;</u> <u>4. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</u> <p><u>Subject to the following standards and terms:</u></p> <ol style="list-style-type: none"> <u>a) The 5-year rolling average does not exceed the Nitrogen Reference Point, or where Nitrogen Reference Point has not been calculated the average loss for the property or enterprise over the 5 year period ending 30 June of the preceding year that the application is made.</u> <u>b) Cattle, horses, deer and pigs are excluded from water bodies in accordance with Schedule C.</u> <p><u>Waikato Regional Council restricts its discretion over the following matters:</u></p> <ol style="list-style-type: none"> <u>i. Cumulative effects on water quality</u> 		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>of the catchment of the Waikato and Waipā Rivers.</u></p> <p><u>ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</u></p> <p><u>iii. The need for and the content of a Farm Environment Plan, including the use of offset mitigation measures.</u></p> <p><u>iv. The term of the resource consent.</u></p> <p><u>v. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</u></p> <p><u>vi. The time frame and circumstances under which the consent conditions may be reviewed."</u></p> <p>AND AMEND to include any appropriate or consequential amendments to the rules set out above, or any other rule in PPC1 in order to address the reasons for submission and/or ensure drafting consistency.</p>		
<p>South Waikato District Council Submitter ID: 72892</p>	<p>PC1-4220</p>	<p>Rule 3.11.5.7</p>	<p>AMEND Rule 3.11.5.7 to be no more restrictive than a discretionary activity.</p> <p>AND CONSIDER reviewing the reasons for adopting Rule 3.11.5.7 and the justification under section 32 regarding the efficiency and effectiveness of this method and rule.</p> <p>AND CONSIDER working with landowners, sector groups and communities to provide alternative practicable measures to achieve the</p>	<p>Support</p>	<p>FFNZ agrees that a non complying activity status is not and agrees that the rule for land use change should be no more restrictive than discretionary..</p> <p>FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			same environmental outcomes.		
Stark, Steven and Theresa Submitter ID: 73721	PC1-5192	Rule 3.11.5.7	DELETE Rule 3.11.5.7 in its entirety.	Support in part	FFNZ agrees that a non complying activity status is not appropriate but FFNZ considers that an activity status needs to be provided for if Rule 7 is deleted as the submitter proposes. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9361	Rule 3.11.5.7	DELETE from Rule 3.11.5.7 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.	Oppose	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). Therefore, FFNZ opposes the deletion of reference to it provided that amendments are made as set out in FFNZ's submission on Variation 1.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11813	Rule 3.11.5.7	RETAIN Rule 3.11.5.7.	Oppose	FFNZ opposes the non complying activity status of Rule 7. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.
The Royal Forest and Bird Protection	PC1-8214	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to ensure that any other activities that result in	Oppose	FFNZ agrees that a non complying activity status is not appropriate nor should all discharges be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Society of New Zealand Incorporated Submitter ID: 74122			increased diffuse discharges are a non-complying activity. AND DELETE references that provide for non-notification.		required to reduce. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase. FFNZ considers that notification will likely cause significant uncertainty and cost and opposes a requirement to notify applications.
The Surveying Company Ltd Submitter ID: 73408	PC1-5739	Rule 3.11.5.7	AMEND Rule 3.11.5.7 so that where the contaminant discharge is the same or lower from the conversion, irrespective of farming type, the then conversion is permitted subject to the provision/update of a Farm Environment Plan. AND AMEND so that conversion to farming activities with a higher discharge is a controlled/Restricted Discretionary activity, with control/discretion to implementation of best practice measures and the provision/update of a Farm Environment Plan.	Support in part	FFNZ agrees that a non complying activity status is not appropriate. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase. For these reasons, FFNZ supports the submitter's proposal to provide a more reasonable consenting pathway through a permitted and controlled/RDA route.
Timberlands Limited Submitter ID: 73036	PC1-3454	Rule 3.11.5.7	DELETE Rule 3.11.5.7. RETAIN expiry date of 1 July 2026 if Rule 3.11.5.7 is not deleted.	Support in part Oppose in part	FFNZ considers that Rule 7 ought to be significantly amended to be a discretionary activity rule with appropriate policy support and information requirements (see FFNZ's submission on Variation 1). In the alternative, and in the event that FFNZ's proposal is not successful, FFNZ agrees the rule ought to be deleted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					FFNZ does not support retaining the expiry date because it is not clear how this would influence consent applications or what the activity status would be post 1 July 2026 (see further reasons in FFNZ submission on Variation 1).
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10511	Rule 3.11.5.7	RETAIN Rule 3.11.5.7.	Oppose	FFNZ opposes the non complying activity status of Rule 7. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.
Waikato and Waipa Branches of the New Zealand Deer Farmers Association Submitter ID: 74008	PC1-9487	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to ensure it does not apply to land use change where it does not exceed the sustainable nitrogen discharge level for the sub-catchment or where the discharge is within the land's natural capability. AND AMEND the consenting period to 25 years from the date the consent is granted.	Oppose in part	<p>FFNZ considers that a non complying activity status is not appropriate but FFNZ. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.</p> <p>FFNZ does not support allocation (see FFNZ's submissions on PC1 and Variation 1) and does not support the proposal to link land use change to "sustainable nitrogen discharge levels" on the basis that this is an allocation approach.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ also considers that there is no reliable proxy for natural capital and that it is not appropriate to allocate on this basis.</p> <p>FFNZ agrees with a 25 year timeframe for consents.</p>
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3526	Rule 3.11.5.7	RETAIN Rule 3.11.5.7.	Oppose	FFNZ opposes the non complying activity status of Rule 7. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.
Waikato District Council (WDC) Submitter ID: 73418	PC1-3118	Rule 3.11.5.7	AMEND Rule 3.11.5.7 with options below (or similar) "is a permitted activity where <u>a) an environmental farm plan is in place, and amendments are undertaken to the plan to encompass the changes in land use by a Certified Farm Environment Planner, .</u> <u>b) Waikato Regional Council are notified 30 days prior to the land use change being initiated.</u> Or otherwise is a restricted discretionary non-complying activity (requiring resource consent)"	Support in part	<p>FFNZ agrees that a non complying activity status is not appropriate. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.</p> <p>For these reasons, FFNZ supports the submitter's proposal to provide a more reasonable consenting pathway through a permitted and controlled/RDA route.</p>
Waikato Focus on Peat Group Submitter ID: 72148	PC1-5520	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to determine land use by the attributes of the land.	Oppose	<p>The proposal would effectively result in a LUC or similar type assessment and allocation.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ also considers that there is no reliable proxy for natural capital and that it is not appropriate to allocate on this basis.</p>
<p>Waikato Regional Council Submitter ID: 72890</p>	<p>PC1-3480</p>	<p>Rule 3.11.5.7</p>	<p>AMEND Rule 3.11.5.7 to read: "Notwithstanding any other rule in the Plan <u>Except as authorised under rules 3.11.5.1, 3.11.5.2, 3.11.5.3 and 3.11.5.4</u> any of the following changes..." OR alternatively AMEND Rule 3.11.5.7 to exclude from its scope, changes of land use that occur within properties or enterprises as existing at the date of notification of the Plan AND AMEND Rule 3.11.5.7 (4) to read: "Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5 <u>or a consent granted under Rule 3.11.5.6.</u>" AND AMEND Rule 3.11.5.7: Notification to read: "Consent applications will be considered without notification,... will be lower than that from the existing land use <u>land use as at 22 October 2016.</u>"</p>	<p>Oppose</p>	<p>FFNZ considers that a non complying activity status is not appropriate but FFNZ. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND Rule 3.11.5.7 to read: "Notwithstanding any other rule in this plan, any of the following changes in the <u>ongoing use... property or enterprise and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens on or into land in circumstances which may result in those contaminants entering water</u> located in the Waikato and Waipā River catchments..."</p> <p>AND AMEND Rule 3.11.5.7(2) to read: "Any livestock grazing other than dairy farming <u>land use, except for commercial vegetable production to dairy farming</u>."</p> <p>AND DELETE Rule 3.11.5.7(3) in its entirety.</p>		
<p>Waipa District Council Submitter ID: 67704</p>	<p>PC1-3190</p>	<p>Rule 3.11.5.7</p>	<p>REPLACE Rule 3.11.5.7 with a rule that specifies that the land use changes listed in it are a discretionary activity with specific criteria to measure applications against, including whether the loss of contaminants will be the same or lower than the existing land use.</p> <p>AND AMEND Rule 3.11.5.7 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules.</p> <p>AND ADD in Rule 3.11.5.7 additional matters of control, standards and terms and matters of discretion providing for offset mitigation,</p>	<p>Support in part</p>	<p>FFNZ agrees that amendments are required to clearly explain how things like subdivision and changes to farm enterprise structure or property ownership are deal with. FFNZ proposes in its submission on Variation 1 that subdivision could be dealt with by a new paragraph f for Rule 4 requiring a new NRP for the lots created by the subdivision.</p> <p>FFNZ supports offsetting and the provision for offsetting in Policy 11 (as amended by FFNZ's submission on Variation 1. However, it considers that care with the matters of control is required and considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).</p> <p>In principle FFNZ supports clarity around definitions</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>generally as outlined in Policy 11. The matters should specify the offset:</p> <ul style="list-style-type: none"> - is for the same contaminant - occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit - remains in place for the duration of the consent and is secured by consent condition <p>AND AMEND Rule 3.11.5.7 and the associated definitions to make it clear how horticulture/viticulture and intensive outdoor animal rearing are covered by the rule. Amend the rule to make it clear how it is to be administered where there is a mix of varied land use changes within the same property or enterprise.</p>		<p>of intensive land uses as requested but this is on the basis that reasonable and appropriate definitions are used and that they reflect the changes requested or address the issues raised in FFNZ's submission on Variation 1.</p>
<p>Wairakei Pastoral Ltd Submitter ID: 74095</p>	<p>PC1-11379</p>	<p>Rule 3.11.5.7</p>	<p>AMEND Rule 3.11.5.7 to read: <u>"A. Any of the following sub-catchment changes in the use of land by an enterprise from that which was occurring at 22 October 2016 within the subject land area:</u> 1. <u>Woody vegetation to farming activities; or</u> 2. <u>Any livestock grazing other than dairy farming to dairy farming; or</u> 3. <u>Arable cropping to dairy farming is a restricted discretionary activity (requiring resource consent) subject to the following requirements:</u> <u>A sub-catchment management plan (prepared in accordance with [new] Schedule 2) is to be provided to the</u></p>	<p>Oppose in part</p>	<p>While FFNZ supports changes in principle that provide for a more reasonable consenting status that non complying, FFNZ does not support the changes sought by this submitter for reasons including that the proposal is based on sub-catchment collectives and FFNZ does not support sub-catchment collectives managing contaminants for reasons including that this is likely to involve allocation (FFNZ does not support allocation), potentially gives significant power to catchment collectives, the potential for abuse of that power and the potential significant cost.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>Waikato Regional Council at the time when the resource consent application is lodged.</u></p> <p><u>Waikato Regional Council restricts its discretion over the following matters:</u></p> <p>i. <u>Conformance with Policy 6(c);</u></p> <p>ii. <u>The content of the sub-catchment management plan prepared for the sub-catchment by the relevant enterprise in accordance with the requirements of [new] Schedule 2;</u></p> <p>iii. <u>The need for and content of a Farm Environmental Plan;</u></p> <p>iv. <u>The adoption of an adaptive management and mitigation approach to manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens;</u></p> <p>v. <u>The term of the resource consent having regard to Policy 13;</u></p> <p>vi. <u>The timeframe and circumstances under which the consent conditions may be reviewed.</u></p> <p><u>B. Any changes in the use of land that enables the development of tangata whenua ancestral lands in conformity with Policies 6(a) and 16 is a restricted discretionary activity/discretionary activity (requiring resource consent).</u></p> <p><u>C. Any sub-catchment changes in the use of land by an enterprise from that which was occurring at 22 October 2016 within the subject land area that does not conform with the matters in</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Rule 3.11.5.7.A, where prior to 1 July 2026 the change exceeds a total of 20 hectares, is a discretionary activity (requiring resource consent) subject to the following requirements: A Sub-catchment management plan (prepared in accordance with [new] Schedule 2) is to be provided to the Waikato Regional Council at the time when the resource consent application is lodged.</p> <p>Notification</p> <p>Consent applications under Rules 3.11.5.7.A, 3.11.5.7.B, and 3.11.5.7.C will be considered without notification, and without the need to obtain written approval of affected persons.</p> <p>D. Notwithstanding any other rule in this Plan, Except as provided for in Rules 3.11.5.7.A, 3.11.5.7.B and 3.11.5.7.C any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares:..."</p>		
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2144	Rule 3.11.5.7	RETAIN Rule 3.11.5.7 as proposed.	Oppose	FFNZ opposes the non complying activity status of Rule 7. FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Waitomo Catchment Trust Board Submitter ID: 73124	PC1-7951	Rule 3.11.5.7	DELETE Rule 3.11.5.7 and provide for land use change in Farm Environment Plans AND AMEND to ensure that low dischargers can increase production to offset rising costs AND AMEND to ensure that properties where mitigation is already in place are taken into account when applying for resource consent.	Support in part	<p>FFNZ agrees that a non complying activity status is not appropriate but FFNZ considers that an activity status needs to be provided for if Rule 7 is deleted as the submitter proposes.</p> <p>FFNZ considers that a reasonable consenting framework ought to be provided through a discretionary activity status for land use change, policy support and information requirements as set out in FFNZ's submission on Variation 1. That means providing for situations where contaminants may increase.</p> <p>FFNZ agrees that flexibility needs to be provided for low nitrogen discharges e.g. to change sheep to cattle ratios and refers to its submission on Variation 1.</p>
Waitomo District Council Submitter ID: 73688	PC1-10335	Rule 3.11.5.7	AMEND Rule 3.11.5.7 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance AND AMEND to include additional matters of control, standards and terms and matters of discretion providing for offset mitigation, generally as outlined in Policy 11. The matters should specify the offset: is for the same contaminant; occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit; and remains in place for the duration of the consent and is secured by consent condition AND REPLACE with a rule that	Support in part	<p>FFNZ agrees that amendments are required to clearly explain how things like subdivision and changes to farm enterprise structure or property ownership are dealt with. FFNZ proposes in its submission on Variation 1 that subdivision could be dealt with by a new paragraph f for Rule 4 requiring a new NRP for the lots created by the subdivision.</p> <p>FFNZ supports offsetting and the provision for offsetting in Policy 11 (as amended by FFNZ's submission on Variation 1). However, it considers that care with the matters of control is required and considers that offsets for different contaminants and different sub-catchments ought to be provided for (albeit possibly through the RD activity rule).</p> <p>FFNZ agrees that land use change ought to be a discretionary activity with appropriate policy support</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>specifies that the land use changes specified in it are a discretionary activity with specific criteria to measure applications against including whether the loss of contaminants will be the same or lower than existing land use.</p> <p>AND AMEND to take an effects based approach, allowing intensification where contaminant discharges are maintained, reduced or offset</p> <p>AND AMEND Rule 3.11.5.7 and the associated definitions to make it clear how horticulture/viticulture and intensive outdoor animal rearing are covered</p> <p>AND AMEND to explain how Rule 3.11.5.7 is to be administered where there is a mix of varied land use changes within the same property or enterprise</p> <p>AND ADD provisions to encourage lower intensity land use changes such as forestry planting or pasture retirement.</p>		<p>and refers to its submission on Variation 1. FFNZ considers that there should be no requirement to reduce all contaminants. FFNZ supports an effects based approach that is not based on ownership or a blanket requirement to reduce all contaminants everywhere. FFNZ supports the use of offsets.</p> <p>In principle FFNZ supports clarity around definitions of intensive land uses as requested but this is on the basis that reasonable and appropriate definitions are used and that they reflect the changes requested or address the issues raised in FFNZ's submission on Variation 1.</p>



Federated Farmers of New Zealand

Further submission on Proposed Waikato Regional Plan Change 1 and Variation 1 Waikato and Waipa River Catchments

17 September 2018



**FURTHER SUBMISSION TO WAIKATO REGIONAL COUNCIL ON PROPOSED WAIKATO
REGIONAL PLAN CHANGE 1 AND VARIATION 1 WAIKATO AND WAIPA RIVER
CATCHMENTS**

Form 6

Further submission in support of, or in opposition to, submission on notified proposed plan change
and plan variation

Clause 8 of Schedule 1, Resource Management Act 1991

To: The Chief Executive
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This is a further submission in support of or in opposition to a submission on a change and variation to Proposed Waikato Regional Plan Change 1 (“**PC 1**”) and Variation 1 (“**Variation 1**”) Waikato and Waipa River Catchments.

1. FFNZ is a person representing a relevant aspect of public interest, including for the reasons set out under headings 1 and 2 on the following pages.
2. FFNZ is a person who has an interest in the proposal that is greater than the interest the general public has, including for the reasons set out in headings 1 and 2 in the following pages.
3. FFNZ could not gain an advantage in trade competition through this further submission.
4. FFNZ wishes to be heard in support of its submissions and further submission.

Due to the size of FFNZ’s further submissions, this document has been separated into four volumes. In each volume, the first three sections are repeated. Section 4 (the specific comments) are different in each volume as follows:

- a. Volume 1 – Objectives
- b. Volume 2 – Policies

- c. Volume 3 – Methods and Rules
- d. Volume 4 – Schedules, Glossary of Terms and consequential amendments

1. INTRODUCTION

- 1.1 FFNZ welcomes the opportunity to provide further submissions on Plan Change 1 and Variation 1.
- 1.2 As identified in its primary submissions, FFNZ represents a variety of dairy, dry stock, arable crops and horticulture land users in the Waikato region. FFNZ is a primary sector organisation with a long and proud history of representing the needs and interests of New Zealand farmers involved in a range of rural businesses. FFNZ is a pan sector organisation that works with farmers to ensure practical and workable outcomes.
- 1.3 FFNZ aims to add value to its members' farming businesses. Its key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
 - a. FFNZ's members may operate their business in a fair and flexible commercial environment;
 - b. FFNZ's members, their families and their staff have access to services essential to the needs of the rural community; and
 - c. FFNZ's members adopt responsible management and environmental practices
- 1.4 FFNZ represents members who are engaged in a wide range of land use activities in the Waikato and Waipa River Catchment. This includes dairy farms, a range of drystock activities (including sheep and beef for meat and wool, cattle grazing for dairy support and deer for meat and velvet), horticulture activities (from commercial vegetable growing to cropping to orchards), a mixture of dairy, dry stock and horticulture and intensive farming activities like pig farming.
- 1.5 Both in the lead up to and following FFNZ's submissions on Plan Change 1 and Variation 1, FFNZ has undertaken extensive consultation with its members. This has included public meetings, member advisories, newspaper articles, discussion groups, one on one meetings, meetings with stakeholders, and projects with individual farmers to understand the implications of Plan Change 1 and Variation 1.
- 1.6 FFNZ has also undertaken extensive consultation with a range of farming and community interest groups, as well as territorial authorities and businesses that rely on the rural economy. As the largest pan sector organisation representing farming interests, FFNZ has attempted to find a middle ground position that attempts to balance the competing interests.

2. IMPORTANCE OF FARMING AND HORTICULTURE

- 2.1 Farming, horticulture and primary production activities are important for the social, economic and cultural wellbeing of people and communities in the Waikato region.
- 2.2 The economic importance of the agriculture sector to New Zealand's economy is well recognised. Its direct and indirect contribution to New Zealand's economy is about 15%.
- 2.3 As a broad indicator, Infometrics 2012 identified the agriculture, forestry and fishing industry as contributing the greatest proportion of the Waikato region's GDP (15.9%) and employing 22,090 followed closely by manufacturing (15.6%) which is estimated to have employed 20,513 in 2012. Notably, the Waikato region accounts for about a third of New Zealand's dairy production. Any regional plan provision which affects farm and horticulture business has the potential to also impact, positively or negatively, on regional and national economies.
- 2.4 Agriculture does not just bring economic benefits to the district, it also contributes to the wellbeing of communities and culture of the district. Farming is the fabric that keeps rural communities together.
- 2.5 Farming is such a large part of New Zealand's culture that a lot of depictions of the 'typical' New Zealander involve farming. For example, we are proud of their 'number 8 wire' mentality – referring to a type of fencing wire used on farms that we will use to solve any problem.

3. GENERAL COMMENTS

- 3.1 The further submission process has been an opportunity for parties to understand each other's position and to provide clarity as to their own position. FFNZ has taken the opportunity to understand the submissions of all parties and has attempted to clarify its position. FFNZ has focused primarily on submissions on Plan Change 1 because it provided a comprehensive and detailed submission on Variation 1 and the majority of submissions on Variation 1 were to either largely confirm relief sought on Plan Change 1 or to propose amendments that were similar to many of the amendments FFNZ proposed in its submission on Variation 1.
- 3.2 FFNZ observes that there is overwhelming opposition to Plan Change 1 with the majority of submitters expressing concerns about the implications for economic, social and cultural wellbeing. There are a range of options proposed for how Plan Change 1 ought to be amended to address these but the key theme appears to be flexibility and the ability to increase nitrogen (and potentially other contaminants), in appropriate circumstances.
- 3.3 The key alternatives proposed by other parties appear to be:
 - a. Adopting an approach based on land use capability ("LUC"), natural capital, land use suitability ("LUS") and/or some other measure of productivity or soil capability.
 - b. Adopting Best Practicable Option ("BPO") for diffuse discharges. Some submitters have proposed that this is on the basis of input controls.

- c. Providing greater flexibility for low nitrogen discharges to increase e.g. allow them to increase up to 20kgN.
 - d. Establishing catchment collectives and allocating nitrogen and other contaminants to them to manage among their members.
 - e. Deleting the Nitrogen Reference Point (“NRP”) and 75th percentile and/or determining the 75th percentile based on sub-catchments or some scale other than the Freshwater Management Units (“FMU”).
 - f. Amending the stock exclusion rules (e.g. to base them on slope, stock units or break feeding) or removing them and considering through tailored actions in Farm Environment Plans (“FEPs”).
- 3.4 FFNZ’s position in respect of these, and all proposals made in the submissions (as articulated in the summary of submissions), is set out in the tables contained in section 4 of this further submission. In summary, FFNZ opposes most of these proposals and considers that the framework proposed in its submission on Variation 1 (through track changes to PC1), and as described on pages 14 to 18 of its submission on Variation 1, is a more appropriate framework that will more reasonably achieve sustainable management.
- 3.5 While there are some similarities between parts of many other submitter’s proposals and FFNZ’s proposal, FFNZ considers that its proposed framework deals with the concerns in a more robust and comprehensive way that seeks to provide for all sectors. Importantly, FFNZ considers that its proposal addresses economic, social and cultural wellbeing in a way that is consistent.
- 3.6 As explained in FFNZ’s submission on Variation 1 (pages 10 to 13), FFNZ has attempted to create a policy and rule framework that is effects based, equitable and consistent (noting that this does not require the “same” outcome but it does require a similar approach). This has included consistency in approach between lakes and rivers; urban and rural, point source and diffuse discharges; effects based not ownership approach; consistency in approach across all farming activities and all contaminants.
- 3.7 There are a limited number of submitters who have proposed amendments to make the timeframes in Plan Change 1 shorter or to make targets more stringent or to make greater progress towards the 80 year targets in a shorter timeframe. FFNZ’s key concern is that these submitters do not appear to have considered the economic, social and cultural costs nor have they considered what is technically feasible on the basis of available technology. FFNZ strongly opposes proposals to make Plan Change 1 more stringent.
- 3.8 In most parts of this further submission, FFNZ’s views are contingent on other changes being made as proposed in FFNZ’s submission on Variation 1. In this sense, FFNZ’s submission on Variation 1 needs to be seen as a package and FFNZ’s view on particular provision cannot (and should not) be viewed in isolation.
- 3.9 By way of example, FFNZ’s views on the NRP are contingent on the “package.” As explained in the detailed comments, FFNZ supports the NRP as long as it is not used as an allocation tool or to benchmark nitrogen. FFNZ supports the NRP being used as a reference

point to provide information regarding current discharges. However, FFNZ's view on the NRP needs to be viewed in the context of the various other changes it proposes to the objectives, policies, methods, rules and schedules.

- 3.10 By way of example (this is not an exhaustive list), FFNZ proposes changes to the permitted activity rules such that low nitrogen discharge activities could increase to 15kgN (or some other appropriate permitted baseline) as a permitted activity. FFNZ proposes changes to the policies (such as policy 6) to support applications to increase nitrogen in appropriate circumstances (e.g. Most Practicable Action ("MPA") framework). FFNZ proposes changes to Schedule B to provide for recognition of mitigations outside of Overseer, the use of models other than Overseer and alternatives to standards or missing data.
- 3.11 Finally, there were a very large number of submissions on Plan Change 1 and Variation 1, and the summary of submissions was equally large. This further submission has ended up comprising four very large documents and has taken considerable time to draft. In these circumstances, it is inevitable that there are likely to be some errors or omissions. FFNZ apologises if any comment in this document causes any offence to any party (none is intended). FFNZ welcomes and looks forward to further discussion with Council and the parties prior to the hearing.

4. SPECIFIC COMMENTS

- 4.1 The table on the following pages sets out the particulars of the original submitter and submission number, the provision to which their submission point relates, the relief they seek, whether FFNZ supports or opposes the submission (in whole or in part), and the reasons for FFNZ's position.
- 4.2 In terms of decisions sought, FFNZ seeks that the submission points are allowed to the extent that they are supported in this further submission and that they are disallowed to the extent that they are opposed in this further submission.
- 4.3 FFNZ also seeks any consequential changes necessary to give effect to the relief sought or to address the concerns raised in this further submission

5. FURTHER SUBMISSION SPECIFICS – VOLUME 4 OF 4

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Schedule A					
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6915	Schedule A	<p>AMEND Schedule A to provide for:</p> <ol style="list-style-type: none"> 1. A definition for Urban Properties; 2. The timely implementation of an online portal for registration of properties, which provides clear and transparent guidance to identify how property owners can gain access to an interactive web-based information page; 3. Clarify in clause 4 what registration information is to be updated, when and how frequently. <p>AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	Support in part	<p>FFNZ agrees that a definition ought to be provided for urban properties and considers an appropriate definition would be to refer to any property no zoned Rural in a District Plan (see FFNZ’s submission on Variation 1).</p> <p>FFNZ supports a online portal (provided there is still an option to manually submit data for those with no ability to access an online portal) but considers that the confidentiality and privacy of the information must be maintained.</p> <p>FFNZ considers that clause 4 ought to only apply to new property owners and there should be no obligation to update data otherwise (unless required elsewhere in PC1).</p>
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10803	Schedule A	RETAIN Schedule A as written.	Support in part Oppose in part	While FFNZ supports the overall intent of Schedule A it considers that several amendments are required. This includes changing the threshold for properties to 4.1ha in the first sentence and adding a paragraph about the purpose of the information being solely for assessing compliance with WRP rules and WRC maintaining the privacy and confidentiality of information (see FFNZ’s submission on Variation 1).
Department of Conservation	PC1-11060	Schedule A	RETAIN Schedule A.	Oppose	While FFNZ supports the overall intent of Schedule A it considers that several amendments are

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 71759			AND AMEND Schedule A to require prompt information collection over a shorter period of time, verification of stocking numbers via reconciliations/receipts, updates to information required regularly (6 monthly) including on stocking numbers and land size (as a result of subdivision/amalgamation).		<p>required. This includes changing the threshold for properties to 4.1ha in the first sentence and adding a paragraph about the purpose of the information being solely for assessing compliance with WRP rules and WRC maintaining the privacy and confidentiality of information (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not agree that information should be provided over a shorter period of time, verification of stock numbers or updates to information six monthly. FFNZ's concerns include that this would likely impose significant cost for no net benefit and would result in very onerous obligations on the majority of landowners in the catchment.</p>
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10637	Schedule A	AMEND Schedule A in accordance with the decision sought by Ballance Agri-nutrients.	Support in part	<p>FFNZ agrees that a definition ought to be provided for urban properties and considers an appropriate definition would be to refer to any property no zoned Rural in a District Plan (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports a online portal (provided there is still an option to manually submit data for those with no ability to access an online portal) but considers that the confidentiality and privacy of the information must be maintained.</p> <p>FFNZ considers that clause 4 ought to only apply to new property owners and there should be no obligation to update data otherwise (unless required elsewhere in PC1).</p>
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5785	Schedule A	AMEND Schedule A to apply to farming activities only OR AMEND, if the intent is to require registration of forestry blocks, Schedule A taking into account	Oppose in part Support in part	FFNZ considers that Schedule A ought to apply to all properties (except urban) for reasons including that it would ensure a consistent approach across all activities and would help WRC to obtain a better understanding of the land uses and locations

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>suggestions to streamline the process including:</p> <ul style="list-style-type: none"> • Being able to enter valuation numbers to automatically bring up the associated property titles. • Being able to enter multiple properties as one entry to enable joining together of blocks run contiguously. • Generating the data from a system that once correct property title(s) are entered automatically generates a boundary map and land area. • Having a default system once plantation forestry is entered to end the entry input requirements. <p>Allow for a non-standard format physical addresses e.g a Forest Name rather than a street address.</p>		<p>throughout the catchment (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports amendments to allow for online registration or reasonable streamlining of the process or to provide for situations where there is no physical address.</p>
Hill Country Farmers Group Submitter ID: 73321	PC1-7899	Schedule A	<p>RETAIN Schedule A. AND AMEND to read: "Schedule A - Registration with Waikato Regional Council...</p> <p>6. Properties that graze livestock must also provide a map showing:</p> <p>a. The location of:</p> <p>i. Property boundaries; and</p> <p>ii. Water bodies listed in Schedule C for stock exclusion within the property boundary and fences adjacent to those water bodies; and</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that the information listed in paragraph 6 ought to be provided if schedule C is amended as proposed in FFNZ's submission on Variation 1. In the event that it is not amended to address FFNZ's concerns, FFNZ agrees that paragraph 6 ought to be deleted.</p>

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			iii. Livestock crossing points over those water bodies and a description of any livestock crossing structures."		
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4468	Schedule A	AMEND PPC1 to protect remaining wetlands and gully seeps and create new incentives to encourage the creation or reinstatement of wetland areas. AND RETAIN Schedule A.	Oppose	FFNZ does not support a blanket approach to protecting all wetlands and gullies for reasons including that it is likely to impose significant cost for no net benefit. FFNZ instead supports a tailored and proportionate approach that considers critical source areas, sub-catchment characteristics and the resources reasonably available. While FFNZ supports the overall intent of Schedule A it considers that several amendments are required. This includes changing the threshold for properties to 4.1ha in the first sentence and adding a paragraph about the purpose of the information being solely for assessing compliance with WRP rules and WRC maintaining the privacy and confidentiality of information (see FFNZ's submission on Variation 1).
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9356	Schedule A	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. <u>Legal description of the individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide a <u>an additional</u> map showing:... ii. <u>Confirmation of water</u> Water bodies listed in Schedule C (and provided by	Oppose	FFNZ is concerned that the requirements to provide maps showing legal parcels and a legal description of individual parcels would be onerous and would not result in any environmental or other benefit. Therefore it opposes the proposed amendments.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>Waikato Regional Council in a map) for stock exclusion within..."</u>		
Matamata-Piako District Council Submitter ID: 73419	PC1-3670	Schedule A	<p>DELETE in Schedule A the 2-hectare threshold and replace with a higher minimum property area threshold for reporting purposes, such as 10 hectares</p> <p>AND AMEND to provide clarity regarding the type and level of information required; is it those activities actually occurring on the property on the nominated day or seasonally based or based on the profile during the month of October for example?</p> <p>AND AMEND to provide guidance on the interpretation of this standard to assist landowners to understand and meet these standards</p> <p>AND AMEND to provide evidence that the section 32 evaluation confirms this is the preferred approach to adopt to achieve the objectives of the Vision and Strategy</p> <p>AND AMEND to provide guidance on mapping requirements to assist landowners to understand and meet these standards.</p>	Support	<p>FFNZ agrees that the 2ha threshold is too low. It would support a higher threshold and considers that 4.1ha would be appropriate to line up with the rule framework but would support a higher threshold if that was appropriate.</p> <p>FFNZ agrees that greater clarity of the required information or a template or guidance would be helpful. It considers that the detail should not be onerous and should be at a level that is easily accessible for farmers.</p>
Miraka Limited Submitter ID: 73492	PC1-8895	Schedule A	RETAIN Schedule A.	<p>Support in part</p> <p>Oppose in part</p>	While FFNZ supports the overall intent of Schedule A it considers that several amendments are required. This includes changing the threshold for properties to 4.1ha in the first sentence and adding a paragraph about the purpose of the information being solely for assessing compliance with WRP rules and WRC maintaining the privacy and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					confidentiality of information (see FFNZ's submission on Variation 1).
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11864	Schedule A	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. <u>Legal description of the individual land parcels that comprise the property or enterprise as per the certificate(s) of title...</u> 6. Properties that graze livestock must also provide <u>an additional map</u> showing:... ii. <u>Confirmation of water bodies listed in Schedule C (and provided by Waikato Regional Council in a map)</u> for stock exclusion within..."	Oppose	FFNZ is concerned that the requirements to provide maps showing legal parcels and a legal description of individual parcels would be onerous and would not result in any environmental or other benefit. Therefore it opposes the proposed amendments.
NZ Transport Agency Submitter ID: 73542	PC1-4838	Schedule A	AMEND Schedule A to clarify who is responsible for registration of properties. AND AMEND Schedule A to define what is meant by 'urban properties'.	Support	FFNZ agrees that clarification about who is responsible for registration ought to be provided e.g. is it lessees, landowners etc. FFNZ agrees that a definition ought to be provided for urban properties and considers an appropriate definition would be to refer to any property no zoned Rural in a District Plan (see FFNZ's submission on Variation 1).
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8740	Schedule A	RETAIN Schedule A's registration requirement AND AMEND Clause 5(d) to refer to land use activities undertaken on the property in the preceding year.	Oppose in part	FFNZ supports the registration requirements subject to amendments as set out in FFNZ's submission on Variation 1 e.g. changes to Schedule C, changes to the property threshold to 4.1ha etc. FFNZ considers that the land use ought to be as at 22 October 2016 and not the previous year for

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					reasons including that the obligation is to register and not to provide ongoing details as to property use.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10597	Schedule A	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <u>an additional</u> map showing:... ii. <u>Confirmation of water</u> Water bodies listed in Schedule C <u>(and provided by Waikato Regional Council in a map)</u> for stock exclusion within..."	Oppose	FFNZ is concerned that the requirements to provide maps showing legal parcels and a legal description of individual parcels would be onerous and would not result in any environmental or other benefit. Therefore it opposes the proposed amendments.
Ravensdown Limited Submitter ID: 74058	PC1-10163	Schedule A	RETAIN the intent of Schedule A as it is currently written.	Support in part Oppose in part	While FFNZ supports the overall intent of Schedule A it considers that several amendments are required. This includes changing the threshold for properties to 4.1ha in the first sentence and adding a paragraph about the purpose of the information being solely for assessing compliance with WRP rules and WRC maintaining the privacy and confidentiality of information (see FFNZ's submission on Variation 1). This is also subject to various amendments to PC1 amendments as set out in FFNZ's submission on Variation 1 e.g. changes to Schedule C, changes to the property threshold to 4.1ha etc.
Southern Pastures Limited Partnership	PC1-11193	Schedule A	Provide further and better particulars of how the registration process will	Support	FFNZ agrees that clarity about the registration process ought to be provided. FFNZ supports a

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74062			operate, including through amendment to the methods described in PPC1.		online portal (provided there is still an option to manually submit data for those with no ability to access an online portal) but considers that the confidentiality and privacy of the information must be maintained. FFNZ would also support a template or guidance document.
South Waikato District Council Submitter ID: 72892	PC1-4115	Schedule A	AMEND in Schedule A the 2 hectare threshold to a higher minimum property area threshold for reporting purposes, such as 10 hectares AND AMEND Schedule A to clarify what type and level of information is required by clause 5(d) AND AMEND Schedule A to provide guidance on the interpretation of clause 5(f) to assist landowners to understand and meet these standards AND AMEND to provide guidance on mapping requirements to assist landowners to understand and meet clause 6 AND AMEND to provide evidence that the section 32 evaluation confirms clause 5(f) the preferred approach to adopt to achieve the objectives of the Vision and Strategy.	Support	FFNZ agrees that the 2ha threshold is too low. It would support a higher threshold and considers that 4.1ha would be appropriate to line up with the rule framework but would support a higher threshold if that was appropriate. FFNZ agrees that greater clarity of the required information or a template or guidance would be helpful. It considers that the detail should not be onerous and should be at a level that is easily accessible for farmers.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11814	Schedule A	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the</u>	Oppose	FFNZ is concerned that the requirements to provide maps showing legal parcels and a legal description of individual parcels would be onerous and would not result in any environmental or other benefit. Therefore it opposes the proposed amendments.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			property <u>or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide a <u>an additional</u> map showing:... ii. <u>Confirmation of water</u> Water bodies listed in Schedule C (<u>and provided by Waikato Regional Council in a map</u>) for stock exclusion within..."		
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8449	Schedule A	AMEND Schedule A to ensure that activities are operating at good or best management practice AND CLARIFY that Schedule A(5)(f) refers to those activities listed occurring at 22 October 2016.	Oppose	In principle, FFNZ supports the adoption of industry agreed GMP. However, FFNZ considers that this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs. FFNZ's concerns include that adopting GMP would be inflexible, would likely impose significant cost and might result in rigid and untailored input controls (see FFNZ's submission on Variation 1).
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10519	Schedule A	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. <u>Legal description of the individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide a <u>an additional</u> map showing:... ii. <u>Confirmation of water</u> Water bodies listed in Schedule C (<u>and provided by</u>	Oppose	FFNZ is concerned that the requirements to provide maps showing legal parcels and a legal description of individual parcels would be onerous and would not result in any environmental or other benefit. Therefore it opposes the proposed amendments.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>Waikato Regional Council in a map) for stock exclusion within..."</u>		
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3527	Schedule A	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <u>an additional map</u> showing:... ii. <u>Confirmation of water bodies</u> listed in Schedule C <u>(and provided by Waikato Regional Council in a map)</u> for stock exclusion within..."	Oppose	FFNZ is concerned that the requirements to provide maps showing legal parcels and a legal description of individual parcels would be onerous and would not result in any environmental or other benefit. Therefore it opposes the proposed amendments.
Waikato Regional Council Submitter ID: 72890	PC1-3536	Schedule A	AMEND Schedule A to read: "Properties with an area greater than 2 hectares <u>4.1 hectares</u> (excluding urban properties) must..." AND AMEND Schedule A clause 3 to read: " <u>Within 7 working days of a request from the Waikato Regional Council, proof of registration must be provided to the Waikato Regional Council...</u> " AND AMEND Schedule A clause 5 to read: "All property <u>land</u> owners must provide..."	Support in part Oppose in part	FFNZ agrees that the threshold ought to be 4.1ha not 2ha. FFNZ agrees that a reasonable timeframe ought to be provided for the provision of information in clause 3 but considers 7 working days is not sufficient and should be longer or the ability for a longer period to be requested e.g. if information is not readily obtainable due to it being held by a third party e.g. lessee, accountant etc. FFNZ agrees with the amendment to "land" owners for consistency but considers that the obligations of all parties ought to be clarified e.g. lessees etc.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Waipa District Council Submitter ID: 67704	PC1-3225	Schedule A	DELETE Schedule A (3). AND AMEND Schedule A (5)(b) to read: " <u>Legal descriptions and certificates of title (computer freehold registers) for all of the land in the property</u> ". AND ADD the following after Schedule A (5)(f): " <u>(g) if the property forms part of an enterprise provide the name of that enterprise</u> ".	Oppose in part	FFNZ considers that proof of registration ought to be provided on request but that reasonable time ought to be provided to respond to the request. FFNZ considers that a requirement to provide a certificate of title would be too onerous and expensive and would not result in any environmental or other benefit. FFNZ agrees that the name of the farm enterprise could be provided but considers that this should not be compulsory.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11383	Schedule A	RETAIN Schedule A as notified or amended by similar wording to like effect.	Support in part Oppose in part	While FFNZ supports the overall intent of Schedule A it considers that several amendments are required. This includes changing the threshold for properties to 4.1ha in the first sentence and adding a paragraph about the purpose of the information being solely for assessing compliance with WRP rules and WRC maintaining the privacy and confidentiality of information (see FFNZ's submission on Variation 1). This is also subject to various amendments to PC1 amendments as set out in FFNZ's submission on Variation 1 e.g. changes to Schedule C, changes to the property threshold to 4.1ha etc.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2145	Schedule A	RETAIN Schedule A as proposed.	Support in part Oppose in part	While FFNZ supports the overall intent of Schedule A it considers that several amendments are required. This includes changing the threshold for properties to 4.1ha in the first sentence and adding a paragraph about the purpose of the information being solely for assessing compliance with WRP rules and WRC maintaining the privacy and confidentiality of information (see FFNZ's submission on Variation 1). This is also subject to various amendments to PC1 amendments as set out in FFNZ's submission on Variation 1 e.g.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					changes to Schedule C, changes to the property threshold to 4.1ha etc.
Waitomo District Council Submitter ID: 73688	PC1-10337	Schedule A	DELETE Schedule A (3) AND AMEND Schedule A 5(b) to read: "Legal descriptions of the property as per the <u>and</u> certificate(s) of title (computer freehold registers) for all of the land in the property)" AND ADD Schedule A after 5(f): "(g) If the property forms part of an <u>enterprise provide the name of that enterprise</u> ".	Oppose in part	FFNZ considers that proof of registration ought to be provided on request but that reasonable time ought to be provided to respond to the request. FFNZ considers that a requirement to provide a certificate of title would be too onerous and expensive and would not result in any environmental or other benefit. FFNZ agrees that the name of the farm enterprise could be provided but considers that this should not be compulsory.
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-11211	Schedule B	RETAIN the OVERSEER Model as the preferred modelling tool for PPC1.	Oppose in part	FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11021	Schedule B	AMEND Schedule B to read: "Schedule B - Nitrogen Reference Point and Updated Leaching Assessments/Te Āpitianga B - Te tohu ā-hauota A property or enterprise with a cumulative area greater than 20 hectares (or any property or enterprise used for commercial vegetable production) must have a Nitrogen Reference Point calculated as follows. <u>Upon consent review, assessments of leaching may need to</u>	Oppose	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ does not support the proposal for updated leaching assessments for reasons including that this entrenches a grandparenting approach and is likely to create significant uncertainty and impose unreasonable cost, particularly with Overseer version changes every six months and some of these having very significant changes to leaching numbers with no change in farm system.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>be recalculated, and the methodology for the calculation of Updated Leaching Assessments is provided as well:</u></p> <p>a. <u>The Nitrogen Reference Point or Updated Leaching Assessment</u> must be calculated by a Certified Farm Nutrient Advisor to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point or <u>Updated Leaching Assessment</u> shall be determined through the Rule 3.11.5.7 consent process.</p> <p>b. The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period specified in clause f), except for commercial vegetable production in which case the Nitrogen Reference Point shall be the average annual nitrogen leaching loss during the reference period. <u>The Updated Leaching Assessment will be the rolling average of all years within a review period.</u></p> <p>c. <u>The Nitrogen Reference Point or Updated Leaching Assessment</u> must be calculated using the current version of the OVERSEER Model (or</p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>any other model approved by the Chief Executive of the Waikato Regional Council).</p> <p>d. <u>The Nitrogen Reference Point or Updated Leaching Assessment</u> data shall comprise the electronic output file from the OVERSEER or other approved model...</p> <p>...</p> <p>f. The reference period is the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016. <u>For Updated Leaching Assessments, the period is stated in Table 3.11-2 for that sub-catchment.</u></p> <p>g. The following records (where relevant to the land use undertaken on the property or enterprise) must be retained and provided to Waikato Regional Council at its request <u>as part of the nitrogen leaching assessment:</u></p> <p>...</p> <p><u>h. Where changes to OVERSEER (or another model approved by the Chief Executive) results in a higher nitrogen discharge modelled for the same OVERSEER input file on any particular property or properties, then the consent holder will be required to modify inputs in order to continue meet the level stated on the consent based on the new version of the</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>model (or new model) unless and until all consents in the sub-catchment are reviewed under the sub-catchment review timeframes as specified in Table 3.11-2.</u></p> <p>Table 1: Data input methodology for ensuring consistency of Nitrogen Reference Point or Updated Leaching Assessment data using the OVERSEER® Model"</p>		
Auckland Council Submitter ID: 73518	PC1-9143	Schedule B	<p>AMEND Schedule B to provide clarity of expectations for local government within areas which overlap the shared Auckland/Waikato regional boundary concerning the Nitrogen Reference Point</p> <p>OR</p> <p>AMEND to provide for the sub-catchments which overlap the shared boundary to be excluded from PPC1.</p>	Support	FFNZ agrees that clarity is required regarding cross boundary issues and considers that properties outside WRC boundaries ought not to be subject to PC1 unless they have had the opportunity to participate in a Schedule 1 process.
Bailey, James Submitter ID: 73926	PC1-9026	Schedule B	<p>AMEND Schedule B to replace the 'staged' approach with an 'Adaptive Management' approach to managing nitrogen and all contaminants</p> <p>AND AMEND PPC1 to recognise Land Use Suitability and Natural Capital as the basis of nitrogen management</p> <p>AND AMEND to enable transition toward the Vision and Strategy with Land Use Suitability as a starting point and using Adaptive Management as our understanding develops, reviewing and adapting through subsequent plan changes.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available.</p> <p>FFNZ considers that LUS and natural capital are not sufficiently developed to provide a basis for nitrogen management. FFNZ does not support allocation of nitrogen or LUC as a basis for allocation.</p> <p>FFNZ considers there ought to be a transition to achieving the Vision & Strategy and that achieving the Vision & Strategy does not require the adoption of 80 year targets in this plan change. FFNZ also considers there should not be a transition to LUS as</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND DELETE the Schedule B requirement to manage property level discharges to a Nitrogen Reference Point based on historic profiles AND AMEND PPC1 to apply Land Use Suitability and Natural Capital now by including allocation based on the Natural Capital of soils through a Land Use Capability approach AND AMEND to provide a flexibility cap for low leaching farm systems below a certain threshold (20kg/N/ha/yr) that is deemed as a sustainable level for the transition period, with farmers with a Nitrogen Reference Point below this enabled to increase up to this point.</p>		<p>a starting point or adaptive management for reasons set out above.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults and to change the benchmarking period and adopt a five year rolling average. FFNZ considers that amendments to Schedule B are required to reflect this and refers to the changes set out in its submission on Variation 1.</p> <p>FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ supports flexibility for low nitrogen discharges to increase but is not sure that 20kgN is the appropriate threshold (FFNZ proposes 15kgN or a suitable permitted baseline in its submission on Variation 1 and refers to the reasons set out therein). FFNZ would support it if it was supported by a robust section 32 assessment.</p>
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6570	Schedule B	<p>AMEND Schedule B(e) to have a realistic timeframe beginning 12 months from the date that PPC1 becomes operative. AND DELETE the words 'Certified Farm Nutrient Advisor' and</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees the time period in paragraph e ought to be realistic, particularly in light of the two year delay since notification of PC1.</p> <p>FFNZ would support the change in terminology to Certified Nutrient Management Advisor provided</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>REPLACE with the words: "<u>Certified Nutrient Management Advisor.</u>"</p> <p>AND AMEND to provide guidance on what happens when OVERSEER is updated guided by reference to 'Using Overseer in Regulation' report prepared by Freeman Environmental, dated August 2016.</p> <p>AND AMEND (g)(i) to require monthly stock numbers to be recorded.</p> <p>AND AMEND (f) so that the reference period covers 2012/13 and 2013/14 in conjunction with 2014/15 and 2015/16 with the ability to choose any two years as the reference point.</p> <p>AND that the reference point for commercial vegetable production is 1 July 2012 to 30 June 2016.</p> <p>AND AMEND Table 1 as follows:</p> <ul style="list-style-type: none"> • Location, Pastoral and horticulture, column two DELETE 'Select Waikato Region' and REPLACE with the words; "<u>Select relevant OVERSEER Region for your farm refer to drop down</u>". • Animal distribution, relative productivity pastoral only; CLARIFY where the non-irrigated 0.75 (75 percent) is taken from. • Block climate data; AMEND to reflect variability in block size and geographical differences. 		<p>that this does not unreasonably reduce the pool of people available to prepare NRPs or increase the cost to farmers or make compliance more stringent.</p> <p>FFNZ agrees that clarity is required around Overseer updates and considers that certainty should be provided for farmers with lowest cost and compliance. FFNZ considers that the outcome for farmers should be the same if there is an Overseer version change and proportionality between NRP and current discharges should be maintained e.g. if there has been no change in farm system the NRP and current output should remain the same.</p> <p>FFNZ is concerned that a requirement to record stock numbers monthly is likely to be too onerous for some farmers (e.g. a service bull operation with significant stock movements) can considers that reasonable flexibility should be provided.</p> <p>FFNZ agrees the reference period ought to be changed but considers that a 10 year period ought to be adopted (not the years 2012 to 2014).</p> <p>FFNZ considers that a 10 year period ought to apply to commercial vegetable growing.</p> <p>FFNZ agrees that Table 1 ought to be clarified as proposed but considers that further flexibility ought to be provided to select the input standard or actual data in appropriate circumstances to ensure that Overseer more accurately reflects the subject farm.</p>

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			<ul style="list-style-type: none"> Soil description; AMEND to provide for the most up to date data (i.e. S-Map data) is utilised and when there is more S-map data then the Overseer soils data be changed to obtain a new reference point. <p>AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>		
Balle Bros Group Submitter ID: 67834	PC1-11433	Schedule B	DELETE Schedule B in its entirety. If not deleted then AMEND to remove the Nitrogen Reference Point from PPC1 and focus on all four contaminants on a sub-catchment basis.	Support in part Oppose in part	<p>FFNZ considers that Schedule B ought to be retained if it is amended as set out in FFNZ's submission on Variation 1, along with the other amendments proposed e.g. flexibility for low nitrogen discharges to increase to 15kgN as a permitted activity, controlled activity for those who want to increase nitrogen but are above 15kgN etc. If these changes are not made, FFNZ considers that Schedule B ought to be deleted as proposed.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate. FFNZ also supports consistency in approach across all four contaminants and refers to its submission on Variation 1.</p>
Beef + Lamb New Zealand Limited	PC1-11506	Schedule B	AMEND Schedule B so it is consistent with 'Best Practice Data	Support in part	FFNZ agrees that the input standards for Overseer ought to reflect the actual farm systems and that

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73369			<p>Input Standards' for the OVERSEER Model and reflects actual farm systems and operations. AND DELETE requirement for a Certified Farm Nutrient Advisor AND REPLACE with a Certified Nutrient Management Advisor. AND DELETE Schedule B Table 1 assumptions where they are inconsistent with 'Best Practice Data Input Standards' for Overseer. AND AMEND to ensure that actual stock weights are used and not the assumptions set out under definition of 'stock unit'. AND ADD a requirement for land owners to provide a summary of soil properties, including land use capability classes, to ensure blocks are developed and applied appropriately within Overseer, and in determination of farm optimisation within natural resource limits. AND AMEND to extend the requirement to provide a Nitrogen Reference Point to align with Priority one, two and three catchment requirements for Farm Environment Plans. AND AMEND Schedule B (f) to apply the Nitrogen Reference Point to the highest of the financial years from 2011-2016.</p>	Oppose in part	<p>reasonable flexibility ought to be provided e.g. to use actual data (where it exists) as opposed to defaults. FFNZ supports amendments to Table 1 to reflect this.</p> <p>FFNZ would support the change in terminology to Certified Nutrient Management Advisor provided that this does not unreasonably reduce the pool of people available to prepare NRPs or increase the cost to farmers or make compliance more stringent.</p> <p>FFNZ opposes a requirement to provide soil properties and capability classes for reasons including that FFNZ opposes a LUC approach and this is likely to be used to justify or to implement a LUC approach to allocating and managing contaminants. FFNZ does not support allocation for reasons including that there is no reliable or equitable basis to allocate and contaminants can be appropriately managed without allocation. FFNZ opposes the proposal to develop natural resource limits for reasons including that this will result in significant cost for no net benefit.</p> <p>FFNZ agrees that NRPs ought to be provided on a priority basis but considers that consideration also needs to be given to the implications for calculating the 75th percentile.</p> <p>FFNZ agrees that the period for the calculation of the NRP needs to be extended and FFNZ thinks it should be a 10 year period from 2005/06 to 2015/16.</p>
Charion Investment Trust	PC1-7811	Schedule B	Schedule B: AMEND PPC1 to remove all reference to the OVERSEER Model, replacing it with	Oppose in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 71344			" <u>any recognised scientific means for determining the possible the leaching of nitrogen and phosphates</u> ". AND AMEND PPC1 so that the nitrogen levels are set at a regional or sub-catchment level [not set at a property level limit].		farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). FFNZ is concerned that the amendments proposed by this submitter will result in greater uncertainty and cost for farmers. FFNZ supports a sub-catchment approach and does not support property level allocation or limits but considers that this is addressed if the NRP is adopted as proposed in FFNZ's submission on Variation 1.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10804	Schedule B	AMEND Schedule B to read: "....as follows: a. The Nitrogen Reference Point must be calculated by a Certified Farm Nutrient Advisor to determine <u>identify the probable</u> amount of nitrogen being leached from the property or enterprise during the relevant reference period specified.... b. The Nitrogen Reference Point shall be the <u>average nitrogen leaching loss that occurred during the reference period</u> highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period... d. The Nitrogen Reference Point data shall comprise the electronic output file from the OVERSEER® or other approved model. <u>Any use of OVERSEER must follow current best</u>	Support in part Oppose in part	FFNZ agrees that amendments to Schedule B are needed to clarify that Overseer is used to estimate nitrogen leaching below the root zone and considers that the words "identify the probable" would address this. FFNZ considers the highest nitrogen leaching loss (not the average as proposed by this submitter) ought to be adopted for reasons including that this would provide greater flexibility and recognition of anomalies e.g. drought or downturn in dairy pay out. However, FFNZ considers that the reference period ought to be extended to a 10 year period and refers to its submission on Variation 1. FFNZ considers that reasonable flexibility to deviate from Overseer ought to be provided to ensure "best fit" for the particular farm. This includes flexibility to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			practice guidance for use of OVERSEER and identify all instances where this has been deviated from and why. and where the OVERSEER @ Model is used, it must be calculated using the OVERSEER @ Best Practice Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B Table 1.		used for enforcement and compliance (see FFNZ's submission on Variation 1).
Dairy Goat Co-Operative (N.Z) Ltd Submitter ID: 74044	PC1-4134	Schedule B	AMEND Schedule B to provide an alternative pathway for the dairy goat sector until such a time as the OVERSEER Model is able to be upgraded.	Support in part	FFNZ agrees that flexibility ought to be provided to recognise things like sectors or farm systems that are not currently modelled in Overseer. FFNZ considers that Schedule B ought to be amended to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). Where a particular farm system or type or sector e.g. dairy goats, horses etc does not fit this FFNZ agrees that a reasonable alternative pathway ought to be provided.
DairyNZ Submitter ID: 74050	PC1-10254	Schedule B	AMEND Schedule B clauses c and d to read: "...c. The Nitrogen Reference Point must be calculated using the current <u>most recent version</u> of the OVERSEER@ Model... d. The nitrogen Reference Point data... with the exceptions and inclusions set out in Schedule B Table 1. <u>When a new version of OVERSEER is issued, the Nitrogen Reference Point may be re-calculated</u>	Support in part	FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>using the latest version of that model. This recalculation should use the same data input file as was used to calculate the first Nitrogen Reference Point in clause a).</u>		FFNZ considers that the word “may” in the proposed additions to paragraph d is important. There should be no obligation to re-calculate. FFNZ would support the use of the same input file if that was sufficient to maintain relativity between NRP and current discharges.
Department of Conservation Submitter ID: 71759	PC1-11065	Schedule B	RETAIN Schedule B.	Support in part Oppose in part	In principle FFNZ supports Schedule B provided that the NRP is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ’s submission on Variation 1). FFNZ considers some important and significant change are required to Schedule B including to provide for flexibility in the calculation of the NRPP, to change the reference point period and to provide for Overseer version changes (see FFNZ’s submission on Variation 1).
Farmers 4 Positive Change (F4PC) Submitter ID: 73355	PC1-10428	Schedule B	REMOVE the Schedule B Nitrogen Reference Point AND AMEND to introduce a sub-catchment planned approach with the Farm Environment Plan as a monitoring tool.	Support in part Oppose in part	FFNZ considers that Schedule B ought to be retained if it is amended as set out in FFNZ’s submission on Variation 1, along with the other amendments proposed e.g. flexibility for low nitrogen discharges to increase to 15kgN as a permitted activity, controlled activity for those who want to increase nitrogen but are above 15kgN etc. If these changes are not made, FFNZ considers that Schedule B ought to be deleted as proposed. FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults and to change the benchmarking period and adopt a five year rolling average. FFNZ considers that amendments to Schedule B are required to reflect this and refers to the changes set out in its submission on Variation 1.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p>
FarmRight Submitter ID: 73720	PC1-5416	Schedule B	<p>AMEND Schedule B(f) to read: "The reference period is the three financial years covering <u>2013/2014, 2014/2015 and 2015/2016</u>, except for commercial vegetable production in which case the reference period is July 2006 to 30 June 2016. <u>In instances where the land use, and associated nitrogen leaching, has changed significantly throughout the reference period, the only applicable years for the purposes of establishing the Nitrogen Reference Point will be those years where the current land use was operating.</u>"</p> <p>AND AMEND Schedule B(g) to read: "The following records ... v. water use records for irrigation (to be averaged over 3 years or longer)</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that the reference period ought to be amended. As set out in FFNZ's submission on Variation 1 it considers that ought to be a 10 year period but in the event that submission point is not successful it would support the three years proposed by this submitter.</p> <p>FFNZ considers that the reference period should not be restricted to the current land use period because there could be a variety of reasons for the change and, for example, a temporary change to a lower intensity land use may inadvertently result in a lower NRP.</p> <p>FFNZ agrees that limiting paragraph (g)(v) to three years would provide greater certainty.</p>

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			in order to determine irrigation application rates."		
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10642	Schedule B	<p>AMEND Schedule B(a) to read: "a. The Nitrogen Reference Point must be calculated by a Certified Farm <u>Nutrient Management</u> Adviser to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point shall be determined through the Rule 3.11.5.7 consent process"</p> <p>AND AMEND Clause (f) to read: "The reference period is the two-four <u>two</u> financial years covering 2014/2015 <u>2012/2013</u> and to 2015/2016, except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016."</p> <p>AND AMEND Clause (g)(i) to read: "Stock numbers are recorded in annual accounts together with stock sale and purchase invoices, <u>or for monthly stock records, farm diary or similar:</u>"</p> <p>AND DELETE the entire second row (beginning 'Location; Pastoral and Horticulture') from Table 1.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ would support the change in terminology to Certified Nutrient Management Advisor provided that this does not unreasonably reduce the pool of people available to prepare NRPs or increase the cost to farmers or make compliance more stringent.</p> <p>FFNZ agrees that the reference period ought to be amended. As set out in FFNZ's submission on Variation 1 it considers that ought to be a 10 year period but in the event that submission point is not successful it would support the four years proposed by this submitter.</p> <p>FFNZ is concerned that the requirement for monthly records may be too onerous but considers that as long as it is optional it would provide greater flexibility for complying with paragraph (g)(i).</p> <p>FFNZ agrees to the deletion of the second row of Table 1 because flexibility ought to be provided to best match the input data to the particular property.</p>
Fletcher Trust Submitter ID: 73848	PC1-9133	Schedule B	<p>REMOVE all reference to the OVERSEER Model from PPC1 AND REPLACE with any recognised scientific means for determining the possible leaching of Nitrogen and</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that Schedule B ought to be retained if it is amended as set out in FFNZ's submission on Variation 1, along with the other amendments proposed e.g. flexibility for low nitrogen discharges to increase to 15kgN as a</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Phosphates (which may include modelling with Overseer in the interim. AND AMEND PPC1 so that Nitrogen levels are set at a regional or sub-catchment level rather than a property level.</p>		<p>permitted activity, controlled activity for those who want to increase nitrogen but are above 15kgN etc. If these changes are not made, FFNZ considers that Schedule B ought to be deleted as proposed.</p> <p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults and to change the benchmarking period and adopt a five year rolling average. FFNZ considers that amendments to Schedule B are required to reflect this and refers to the changes set out in its submission on Variation 1.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p>
<p>Fonterra Co-operative Group Ltd Submitter ID: 74057</p>	<p>PC1-10517</p>	<p>Schedule B</p>	<p>AMEND Schedule B Part c to read: "...c. The Nitrogen Reference Point must be calculated using the current <u>most recent version</u> of the OVERSEER Model (or any other model approved by the Chief Executive of the Waikato Regional Council)..." AND ADD a NEW Part eA of Schedule B to read:</p>	<p>Support in part Oppose in part</p>	<p>FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.</p>

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			<p><u>"...eA: Once a year, following the release of a new version of Overseer (or any other model approved by the Chief Executive of the Waikato Regional Council), the Nitrogen Reference Point will be recalculated by the Waikato Regional Council (or for those registered to a Certified Industry Scheme, by the Certified Industry Scheme provider) using the latest version of that model and same data input file as was used to calculate the Nitrogen Reference Point submitted to Council in accordance with part e of this Schedule. When such a recalculation occurs, the resulting leaching rate becomes the Nitrogen Reference Point for the purposes of Rules 3.11.5.2 to 3.11.5.7..."</u></p> <p>AND AMEND Table 1 setting used for 'missing data' as follows: "In the absence of Nitrogen Referencing information being provided, the Waikato Regional Council will use appropriate default numbers for any necessary inputs to the Overseer Model. (e)Such default numbers will generally be around 75% of normal FMU average values for those inputs). <u>for the particular farm system type but may be adjusted on the basis of farm production data which shall be provided in all cases where the complete suite of Nitrogen</u></p>		<p>FFNZ opposes the new paragraph eA for reasons including that it requires the NRP to be recalculated if there is an Overseer version change and this would be a very onerous obligation as version change are approximately every six months. FFNZ would support the use of the same input file if that was sufficient to maintain relativity between NRP and current discharges.</p> <p>FFNZ supports the proposed changes to Table 1 on the basis that they provide greater flexibility for calculation of the NRP where there is missing data. FFNZ considers that the resulting NRP should be as tailored to the particular farm as possible.</p> <p>FFNZ agrees that the setting for soil description ought to be S maps and refers further to the reasons contained in its submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>Referencing information is unavailable.</u></p> <p>AND REPLACE the setting that must be used in that cell corresponding to the 'Soil Description' line of Table 1 to read:</p> <p><u>"In any Farm Management Unit that has complete coverage of S Map, obtain soil description from the Link to S Map within Overseer.</u></p> <p><u>In any Farm Management Unit that does not have complete coverage of S Map use soil order from LRI 1:50,000 data or a soil map of the farm."</u></p>		
<p>Fonterra Shareholders Council</p> <p>Submitter ID: 72610</p>	PC1-10645	Schedule B	<p>AMEND Schedule B by providing further detail with regards to the method that will manage the OVERSEER Model version changes.</p>	Support	<p>FFNZ agrees that greater clarity is required about Overseer version changes and considers that relativity between NRP and current discharges needs to be maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that Schedule B ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.</p>
<p>Gleeson, Graeme B</p> <p>Submitter ID: 73800</p>	PC1-6421	Schedule B	<p>AMEND Schedule B to adopt a sub-catchment approach to focus on contaminants important to each farm and sub-catchment.</p> <p>AND AMEND to ensure Farm Environment Plans assess appropriate land use options for each farm, and encourage better science to determine which contaminants are</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that Schedule B ought to be retained if it is amended as set out in FFNZ's submission on Variation 1, along with the other amendments proposed e.g. flexibility for low nitrogen discharges to increase to 15kgN as a permitted activity, controlled activity for those who want to increase nitrogen but are above 15kgN etc.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>of concern for each farm and sub-catchment.</p> <p>AND DELETE requirements to manage farming activities to a historic Nitrogen Reference Point AND REPLACE with live weight standards linked to the natural capital of soils, climate and assimilative capacity of water OR allocate nitrogen as it is tied to the natural capital of soils.</p> <p>AND DEVELOP greater understanding about spatial location of natural resources so this knowledge can be applied to better inform and manage contaminant loss.</p> <p>AND AMEND or ADD new rules that are based on land class and pasture production capability, where land use is supported by the capability of the land giving rise to contaminant loss no greater than acceptable ecosystem health limits. OR ADOPT equal nitrogen allocation flexibility for all land users (at 20kgN/ha) as a permitted activity.</p> <p>AND DELETE 75th percentile nitrogen leaching value AND REPLACE with requirements and standards that ensure the reductions required in over-allocated catchments, and where nitrogen is an issue, are proportionate to the level of improvement required and the impact of the discharge. Highest dischargers should be targeted first and consideration should be given to the</p>		<p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ considers that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults and to change the benchmarking period and adopt a five year rolling average. FFNZ considers that amendments to Schedule B are required to reflect this and refers to the changes set out in its submission on Variation 1.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support linking live weight standards to natural capital of soils for reasons including that there is no reasonable proxy for natural capital or assimilation of contaminants, such an approach is likely to be used to justify or implement an allocation approach and FFNZ does not support allocation, FFNZ considers that LUC is not a proxy for natural capital, such an approach is likely to result in significant cost for no net benefit and as otherwise set out in this document or FFNZ's submission on PC1 and Variation 1.</p> <p>In principle, FFNZ supports an approach that requires the 75th percentile to reduce but FFNZ considers that further consideration needs to be</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>economic implications of reducing and the timeframe for making reductions.</p> <p>AND AMEND the rules to ensure low contaminant loss land uses are a permitted activity.</p> <p>AND AMEND to ensure that high nitrogen dischargers, except horticulture, are required to reduce over time, starting immediately, and achieving 10% reductions every year for the life of PPC1.</p> <p>AND AMEND to ensure horticultural nitrogen losses are managed in a manner that recognises the value of the industry to the community.</p>		<p>given to the appropriate spatial scale (e.g. the Upper Waikato FMU is too large and varied) and to how the NRP is calculated. FFNZ also considers that an appropriate consenting pathway ought to be provided where it is not possible to reduce due to economic implications or geographical location etc. FFNZ refers further to its submission on Variation 1.</p> <p>FFNZ does not support the 80 year numeric targets or the use of these to determine over allocated catchments or the requirement for property level reductions in nitrogen discharges based on this. FFNZ does not require a blanket requirement to reduce by 10% and considers that a tailored and proportionate approach ought to be adopted.</p> <p>FFNZ agrees that the value of the horticulture industry to the community ought to be recognised and provided for, along with the value of other farming sectors to the community.</p>
Greenlea Premier Meats Ltd Submitter ID: 72144	PC1-7526	Schedule B	<p>DELETE requirements for land use activities to not exceed their historic Nitrogen discharge levels when below 20kgN/ha/yr.</p> <p>AND AMEND to enable low leaching and land uses (below 20kgN/ha/yr) to increase discharges up to 20kgN/ha/yr.</p> <p>AND AMEND by basing the nitrogen allocation system on the natural capital of soils taking into consideration the assimilative capacity of freshwater.</p>	Support in part Oppose in part	<p>FFNZ considers that almost all farming activities ought to obtain a NRP but that flexibility ought to be provided for increases e.g. low nitrogen discharges can increase to 15kgN as a permitted activity (see FFNZ's submission on Variation 1). FFNZ would support a limit of 20kgN for the permitted activity rule if it was supported by a robust section 32 assessment.</p> <p>FFNZ opposes the proposal to allocate nitrogen and to do it on the basis of natural capital for reasons including that there is no reasonable proxy for natural capital or assimilation of contaminants, such an approach is likely to be used to justify or implement an allocation approach and FFNZ does not support allocation, FFNZ considers that LUC is</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					not a proxy for natural capital, such an approach is likely to result in significant cost for no net benefit and as otherwise set out in this document or FFNZ's submission on PC1 and Variation 1.
Greenplan Holdings Limited Submitter ID: 73893	PC1-2960	Schedule B	DELETE Schedule B. AND AMEND so that all contaminants are treated with the same level of importance. AND MAKE any consequential amendments.	Support in part Oppose in part	FFNZ considers that Schedule B ought to be retained if it is amended as set out in FFNZ's submission on Variation 1, along with the other amendments proposed e.g. flexibility for low nitrogen discharges to increase to 15kgN as a permitted activity, controlled activity for those who want to increase nitrogen but are above 15kgN etc. If these changes are not made, FFNZ considers that Schedule B ought to be deleted as proposed. FFNZ agrees that a consistent approach ought to be adopted across all four contaminants and refers to its submission on Variation 1.
Hamilton, Malibu Submitter ID: 74083	PC1-10363	Schedule B	AMEND PPC1 so that the nitrogen leaching allocation is based on Land Use Capability and suitability [more detail provided in the submission about how this could be done] AND AMEND to ensure polluters pay the cost of clean up, not the public AND AMEND to ensure that any rate or clean up tax is based on percentage contribution by sector AND AMEND to provide a pollution tax to clean up the waterbodies. AND AMEND to ensure that revenue obtained through abstraction and metering is used for conservation purposes as well as cost recovery for monitoring costs.	Oppose	FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC or LUS is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit. FFNZ also considers that there is no reliable proxy for natural capital and that it is not appropriate to allocate on this basis. FFNZ considers that public funding ought to be available for public benefit and that a polluter pays or tax approach has issues including that it is a blunt instrument, not suited for diffuse discharges

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					(which cannot be easily measured or observed or turned off/stopped) and this would likely impose significant cost for no net benefit.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5786	Schedule B	DELETE Schedule B and reference to the Nitrogen Reference Point OR AMEND the approach such that Nitrogen Reference Points are used as an information gathering tool only.	Support in part	FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ considers that Schedule B ought to be retained if it is amended as set out in FFNZ's submission on Variation 1, along with the other amendments proposed e.g. flexibility for low nitrogen discharges to increase to 15kgN as a permitted activity, controlled activity for those who want to increase nitrogen but are above 15kgN etc. If these changes are not made, FFNZ considers that Schedule B ought to be deleted as proposed.
Hill Country Farmers Group Submitter ID: 73321	PC1-7903	Schedule B	DELETE Schedule B. AND AMEND PPC1 to consider the need for financial records to be provided to Waikato Regional Council.	Support in part Oppose in part	FFNZ considers that Schedule B ought to be retained if it is amended as set out in FFNZ's submission on Variation 1, along with the other amendments proposed e.g. flexibility for low nitrogen discharges to increase to 15kgN as a permitted activity, controlled activity for those who want to increase nitrogen but are above 15kgN etc. If these changes are not made, FFNZ considers that Schedule B ought to be deleted as proposed. In principle, FFNZ considers that there should be no need to provide financial records and the confidentiality or privacy of any information provided ought to be maintained.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10190	Schedule B	AMEND Schedule B to ensure that alternatives to the OVERSEER Model are available to calculate the Nitrogen Reference Point for the arable and commercial vegetable sector.	Support in part	FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults and to change the benchmarking period and adopt a five year rolling average. FFNZ

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND to simplify the protocol for the use of Overseer in the following manner:</p> <p>"A. The Nitrogen Reference Point must be calculated by <u>a person who is certified as being competent to do so, with a certification being approved by the Chief Executive of the Waikato Regional Council Certified Farm Nutrient Advisor</u> to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point shall be determined through the Rule 3.11.5.7 consent process.</p> <p>B. The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period specified in clause f), except for commercial vegetable production in which case the Nitrogen Reference Point shall be the average annual nitrogen leaching loss <u>in kilograms per hectare per year</u> during the reference period.</p> <p>C. The Nitrogen Reference Point must be calculated using the current version of the OVERSEER® Model, APSIM or SPASMO (or any other model approved by the Chief</p>		<p>considers that amendments to Schedule B are required to reflect this and refers to the changes set out in its submission on Variation 1.</p> <p>FFNZ considers that this needs to be provided for all sectors not just arable and commercial vegetable.</p> <p>FFNZ supports the amendment to paragraph A, B, C, D and G for reasons including that clarity and reasonable flexibility ought to be provided, information ought to be provided on request and confidentiality and privacy of data (e.g. if annual reports are provided) ought to be maintained.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Executive of the Waikato Regional Council).</p> <p>D. The Nitrogen Reference Point data shall comprise the electronic output file from the <u>OVERSEER®, APSIM or SPASMO</u>, or other approved model, and where the OVERSEER Model is used, it must be calculated using the OVERSEER Best Practice Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B Table 1.</p> <p>...</p> <p>G. The following records (where relevant to the land use undertaken on the property or enterprise) must be retained and <u>provided available for inspection by the Waikato Regional Council</u> at its request:</p> <p>i. Stock numbers <u>as recorded in annual accounts</u> together with stock sale and purchase invoices;</p> <p>...</p> <p>vi. The representative range of <u>c</u>Grops grown on the land; and</p> <p>vii. Horticulture crop diaries and NZGAP records."</p>		
Lakes and Waterways Action Group Trust (LWAG) Submitter ID: 53342	PC1-4076	Schedule B	AMEND Schedule B so that an independent and transparent model be used alongside OVERSEER towards 'rewarding' best management on-farm and water quality remediation options AND AMEND to extend the timeframe for calculating the Nitrogen	Support in part Oppose in part	FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults and to change the benchmarking period and adopt a five year rolling average. FFNZ considers that amendments to Schedule B are required to reflect this and refers to the changes set out in its submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Reference Point to five years for sheep and beef.		FFNZ agrees that the reference period ought to be amended. As set out in FFNZ's submission on Variation 1 it considers that ought to be a 10 year period but in the event that submission point is not successful it would support the five years proposed by this submitter provided it applied to all sectors not just sheep and beef.
Lawson, John Submitter ID: 52942	PC1-11219	Schedule B	AMEND Schedule B to ensure that allocation is based on the Land Use Capability and suitability AND AMEND to ensure that the values of water bodies are identified AND AMEND to ensure that once values have been identified, limits are set to protect the most stringent value on a spatial and temporal basis AND AMEND to ensure allocation of costs to clean up should be polluter pays AND AMEND to ensure that any rate on clean up tax is based on percentage contribution by sector AND AMEND to provide a pollution tax to clean up the waterbodies. AND AMEND to ensure that revenue obtained through abstraction and metering is used for conservation purposes as well as cost recovery for monitoring costs.	Oppose	FFNZ does not support a proposal to allocate and to base that on LUC or LUS or natural capital for reasons including that there is no reasonable proxy for natural capital or assimilation of contaminants, such an approach is likely to be used to justify or implement an allocation approach and FFNZ does not support allocation, FFNZ considers that LUC is not a proxy for natural capital, such an approach is likely to result in significant cost for no net benefit and as otherwise set out in this document or FFNZ's submission on PC1 and Variation 1. FFNZ does not support the 80 year numeric targets, setting sub-catchment limits on the basis of them and then adopting property limits based on this. FFNZ does not support a pollution tax approach for reasons including that it is a blunt instrument, not suited for diffuse discharges (which cannot be easily measured or observed or turned off/stopped) and this would likely impose significant cost for no net benefit.
Lumsden, Malcolm John Submitter ID: 73454	PC1-2498	Schedule B	AMEND Schedule B to have a definitive statement that OVERSEER is only a guide tool. AND AMEND to specify the limits on information that is required and how	Support in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>the information is collected and managed.</p> <p>AND AMEND so that the landowner supplies only the stock reconciliation from annual accounts.</p> <p>AND AMEND to clarify the printout of purchase from Fertiliser suppliers to farmer supplied by accountant to the Waikato Regional Council.</p> <p>AND AMEND to simplify that total milk solids is a single figure from the company's end of year statement supplied by accountant for each supply number.</p> <p>AND AMEND to clarify stock feed sold or purchased is supplied from accounts by accountant.</p>		<p>flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers it important that confidentiality and privacy of information is maintained, as well as being clear about the purpose of any information collected and therefore agrees that limits on the use of information.</p> <p>FFNZ agrees that just stock reconciliation numbers from annual accounts ought to be provided, not the entire accounts. And that options like print outs of fertiliser supplies ought to be provided for.</p> <p>FFNZ agrees that information to be supplied ought to be streamlined and simplified e.g. milk solids and confirmation from accountant.</p>
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9364	Schedule B	<p>AMEND Schedule B to read: "A property or enterprise with a...</p> <p>b. The Nitrogen Reference Point shall be the <u>average nitrogen leaching loss that occurred during the reference period</u>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period (specified in clause f)...</p> <p>f. The reference period is an average of the five years between the five financial years spanning 2011/12 to 2015/16 (as consistent with the five year rolling average in 5(a) in Schedule 1) <u>the two financial years</u></p>	<p>Oppose in part</p> <p>Support in part</p>	<p>FFNZ considers the highest nitrogen leaching loss (not the average as proposed by this submitter) ought to be adopted for reasons including that this would provide greater flexibility and recognition of anomalies e.g. drought or downturn in dairy pay out.</p> <p>FFNZ considers that the reference period ought to be extended to a 10 year period and refers to its submission on Variation 1. But in the even that is not successful it would support a five year period and a five year rolling average.</p> <p>FFNZ agrees that there ought to be the option in Table 1 to use actual data as opposed to defaults and agrees to amendments to Table 1 to provide for this.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>covering 2014/2015 and 2015/2016, except for commercial vegetable..." AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions:</p> <ul style="list-style-type: none"> • (ADD a third bullet point) <u>Where the farm has verifiable farm operational data that is capable of showing the relative use of various blocks on the farm by different classes of livestock."</u> <p>ADD to the third Column, the words: <u>"Where verification is possible relative difference should be allowed to be used to encourage smart land use and production systems consistent with Policy 5."</u></p> <p>Animal weights, second column, "Only use OVERSEER defaults - do not enter in weights and... (national averages). <u>Except where the farm has verifiable digital data of stock weights at the appropriate times."</u></p> <p>Third column, <u>"Accurate animal weights are difficult to obtain and prove but those operators who manage and collect verifiable weights should be able to use them."</u></p> <p>Soil description, second column, <u>"For dairy systems Use Soil Order - obtained from S-Map or where S-Map</u></p>		<p>FFNZ supports clarity or consistency in calculating the 75th percentile but is not sure of the practical effect of the submitter's proposed amendments to this column. FFNZ would support it if it resulted in a reasonable, consistent, fair, practical, affordable and cost effective outcome.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>is unavailable from LRI 1:50,000 data or a soil map of the farm. <u>For all other land uses use the best verifiable information available.</u>"</p> <p>ADD to the third column "To ensure consistency between areas... that don't for the purposes of developing the Nitrogen Reference Point 75th percentile."</p>		
<p>Matamata-Piako District Council Submitter ID: 73419</p>	<p>PC1-3678</p>	<p>Schedule B</p>	<p>AMEND Schedule B to provide an effects based approach to contaminant management including nitrogen leaching AND AMEND to provide an effects based approach to address the other targeted contaminants - phosphorous, sediment and microbial pathogens AND AMEND to read as follows: "A property or enterprise with a cumulative area greater than 2010 hectares (or any property or enterprise used for commercial vegetable production) must have a Nitrogen Reference Point calculated as follows..." AND AMEND to provide evidence that the section 32 evaluation confirms Schedule B a. is the preferred approach to adopt and there are appropriately qualified and experienced professionals able to provide this information AND AMEND to provide evidence that the section 32 evaluation confirms that OVERSEER is the</p>	<p>Support in part Oppose in part</p>	<p>FFNZ supports an effects based approach to managing contaminants. It also supports an approach that is consistent across all four contaminants and refers further to its submission on Variation 1.</p> <p>FFNZ considers that the NRP ought to apply to properties above 20ha not 10ha as proposed for reasons including that FFNZ is concerned that this would impose significant cost for no net benefit.</p> <p>FFNZ agrees that a robust section 32 assessment needs to be presented for Schedule B.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			preferred method and rule for monitoring and setting consent conditions for nitrogen leaching for all primary production activities.		
Miraka Limited Submitter ID: 73492	PC1-8896	Schedule B	RETAIN Schedule B AND CLARIFY the specific OVERSEER Model referred to in Schedule B(c) and (d) and its relationship to the timing in (e).	Support in part Oppose in part	In principle FFNZ supports Schedule B provided that the NRP is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). FFNZ considers some important and significant changes are required to Schedule B including to provide for flexibility in the calculation of the NRPP, to change the reference point period and to provide for Overseer version changes (see FFNZ's submission on Variation 1).
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4647	Schedule B	AMEND Schedule B(c) to read: "The Nitrogen Reference Point must be... of the OVERSEER Model (<u>or the standalone pig module</u>) (or any other model...)" AND AMEND Table 1 to read: "Animal weights, Only use OVERSEER defaults... where available (national averages) <u>with the exception of pig weight data.</u> "	Support in part	In principle FFNZ supports Schedule B provided that the NRP is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as an on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). FFNZ sees the suggested standalone pig model and pig weight data as being things that would be addressed through the flexibility FFNZ seeks to the use of Overseer.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					FFNZ considers some important and significant changes are required to Schedule B including to provide for flexibility in the calculation of the NRP, to change the reference point period and to provide for Overseer version changes (see FFNZ's submission on Variation 1).
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11865	Schedule B	<p>AMEND Schedule B to read: "A property or enterprise with a...</p> <p>b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period (specified in clause f)...</p> <p>f. The reference period is an average of the five years between the five financial years spanning 2011/12 to 2015/16 (as consistent with the five year rolling average in 5(a) in Schedule 1)<u>the two financial years covering 2014/2015 and 2015/2016,</u> except for commercial vegetable..."</p> <p>AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions:</p> <ul style="list-style-type: none"> • (ADD a third bullet point) <u>Where the farm has verifiable farm operational data that is capable of showing the relative use of various blocks</u> 	<p>Oppose in part</p> <p>Support in part</p>	<p>FFNZ considers the highest nitrogen leaching loss (not the average as proposed by this submitter) ought to be adopted for reasons including that this would provide greater flexibility and recognition of anomalies e.g. drought or downturn in dairy pay out.</p> <p>FFNZ considers that the reference period ought to be extended to a 10 year period and refers to its submission on Variation 1. But in the even that is not successful it would support a five year period and a five year rolling average.</p> <p>FFNZ agrees that there ought to be the option in Table 1 to use actual data as opposed to defaults and agrees to amendments to Table 1 to provide for this.</p> <p>FFNZ supports clarity or consistency in calculating the 75th percentile but is not sure of the practical effect of the submitter's proposed amendments to this column. FFNZ would support it if it resulted in a reasonable, consistent, fair, practical, affordable and cost effective outcome.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>on the farm by different classes of livestock."</u></p> <p>ADD to the third Column, the words: "<u>Where verification is possible relative difference should be allowed to be used to encourage smart land use and production systems consistent with Policy 5.</u>"</p> <p>Animal weights, second column, "Only use OVERSEER defaults - do not enter in weights and... (national averages). <u>Except where the farm has verifiable digital data of stock weights at the appropriate times.</u>"</p> <p>Third column, "<u>Accurate animal weights are difficult to obtain and prove but those operators who manage and collect verifiable weights should be able to use them.</u>"</p> <p>Soil description, second column, "<u>For dairy systems Use Soil Order - obtained from S-Map or where S-Map is unavailable from LRI 1:50,000 data or a soil map of the farm. For all other land uses use the best verifiable information available.</u>"</p> <p>ADD to the third column "To ensure consistency between areas... that don't <u>for the purposes of developing the Nitrogen Reference Point 75th percentile.</u>"</p>		
Ngati Haua Tribal Trust	PC1-1975	Schedule B	AMEND Schedule B to provide for the long term averaging of nitrogen losses.	Support in part	In principle, FFNZ supports a long term averaging approach that provides for reasonable fluctuations e.g. due to climatic or economic changes etc.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73025			<p>AMEND to include alternative tools such as the use of the natural capital approach.</p> <p>AMEND by utilising tools such as MENUs as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by OVERSEER.</p> <p>AND AMEND where Overseer is to be used as part of the creation of solutions, calculations must be used as a guide only and the focus to be on the trends that are used.</p>	Oppose in part	<p>FFNZ does not agree to amending Schedule B to include alternative tools like a natural capital approach. This is for reasons including that FFNZ is concerned there is no reasonable proxy for natural capital, such an approach will used to justify or inform an allocation approach, FFNZ does not support allocation and such an approach is likely to result in significant cost for no net benefit.</p> <p>FFNZ supports the consideration of alternative models to Overseer and flexibility to recognise mitigations outside of Overseer and/or changes to input standards. FFNZ therefore agrees that tools such as MENUs ought to be able to be considered.</p> <p>FFNZ agrees that Overseer should be used as a decision support tool ad to guide solutions as opposed to a regulatory tool.</p>
NZ Forest Managers Ltd Submitter ID: 73443	PC1-6003	Schedule B	REMOVE grandparenting of nitrogen approach from PPC1.	Support in part	<p>FFNZ does not support any form of allocation, including grandparenting.</p> <p>In principle FFNZ supports Schedule B provided that the NRP is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as an on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers some important and significant changes are required to Schedule B including to provide for flexibility in the calculation of the NRP, to</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					change the reference point period and to provide for Overseer version changes (see FFNZ's submission on Variation 1).
O.M and P.R Houchen Ltd Submitter ID: 71655	PC1-7834	Schedule B	AMEND PPC1 so it includes provisions to discourage water from draining into the hills which will slow the water down in the swamps and filter out the nutrients and in combination with a troughing system should control the problem. AND AMEND PPC1 so planting of deciduous trees is encouraged as grass can grow down to the tree roots with troughs being places close to the shade on firm dry land. The surrounds of the troughs should be joined together with gateways and crossings to comply with health and safety and sediment run off. AND AMEND the Nitrogen Reference Point provisions of PPC1 so they are flexible for hill country.	Support in part Oppose in part	FFNZ supports consideration of a wide range of mitigations including on farm actions, edge of field mitigations, multiple property mitigations and whole of catchment actions. However, it considers that the mitigations ought to be tailored to the particular situation and should not be imposed on all properties e.g. as minimum standards. Therefore FFNZ does not agree that PC1 should have provisions regarding discouraging water from draining into hills and planting deciduous trees. FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ considers that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults. FFNZ refers further to its submission on Variation 1. FFNZ agrees that flexibility ought to be provided for low nitrogen discharge activities to increase to either 15kgN or some other appropriate "permitted baseline" (and FFNZ refers to its submission on Variation 1).
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8743	Schedule B	DELETE Schedule B AND IF the alternative approach proposed in the submission is not accepted THEN AMEND Schedule B by requiring the provision of the parameter files or a certified XML file of the OVERSEER Model for the preparation of the Nitrogen	Oppose in part	FFNZ considers that Schedule B ought to be retained if it is amended as set out in FFNZ's submission on Variation 1, along with the other amendments proposed e.g. flexibility for low nitrogen discharges to increase to 15kgN as a permitted activity, controlled activity for those who want to increase nitrogen but are above 15kgN etc.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Reference Point and to ensure that these files form part of the audit process and are provided to Waikato Regional Council as part of the Nitrogen Reference Point data. AND AMEND Clause (d) to read: "The Nitrogen Reference Point data shall comprise the electronic <u>input</u>, <u>output</u> and <u>parameter</u> files from the Overseer or other approved model..." AND AMEND Schedule B Clause (e) by changing the requirement to provide the Nitrogen Reference Point and data to the Council to within 6 months of data of the plan becoming operative (unless the period stipulated is earlier). AND ADD a new clause to Schedule B - Clause g to read: (viii) The information in Clause (d). AND AMEND PPC1/Schedule B to ensure that the Nitrogen Reference Point is used as a benchmark and is not used as the basis for grandparenting.</p>		<p>If these changes are not made, FFNZ considers that Schedule B ought to be deleted as proposed.</p> <p>FFNZ opposes the BPO approach proposed by this submitter. In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc.</p> <p>FFNZ has concerns with the provision of data files as proposed by the submitter including that this may be onerous and privacy and confidentiality of information needs to be maintained.</p> <p>FFNZ agrees a reasonable timeframe for provision of data ought to be provided and agrees with the proposal of six months of the plan becoming operative.</p> <p>FFNZ agrees the NRP ought to be used as a reference point and not as grandparenting or allocation.</p>
Open Country Dairy Submitter ID: 74182	PC1-5418	Schedule B	<p>AMEND Schedule B to clarify how the 14/15 15/16 data point is established if ownership has changed. AND AMEND to clarify what current version of OVERSEER means. AND AMEND to clarify how changing versions on Overseer will this be handled- will rolling 5 year average</p>	Support in part	<p>FFNZ agrees that a reasonable provision ought to be made for calculating the NRP if the input data is not held or is incomplete e.g. if ownership has changed.</p> <p>FFNZ agrees that clarity should be provided as to the meaning of "current version" of Overseer and to how version changes will be handled.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>be based on historic correction or be at face value. AND AMEND 75th percentile nitrogen leaching value approach to look at a more graduated stepped approach to Nitrogen Reference Point with variable timelines. AND AMEND reference period [benchmark seasons] to include 16/17 season.</p>		<p>FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.</p> <p>FFNZ also supports a five year rolling average as a basis to provide flexibility for unexpected events that impact on nitrogen e.g. drought, flood etc.</p> <p>FFNZ considers that a reasonable pathway ought to be provided for those above the 75th percentile and to recognise geophysical characteristics e.g. pumice soils and high rainfall (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that the reference period ought to be amended. As set out in FFNZ's submission on Variation 1 it considers that ought to be a 10 year period but in the event that submission point is not successful it would support the inclusion of the 16/17 season as proposed by this submitter.</p>
Pamu Farms of New Zealand Submitter ID: 74000	PC1-5849	Schedule B	AMEND Schedule B to state how suitable quality input parameters for alternative models will be developed. AND AMEND to provide for the use of farm specific or location specific data inputs, in particular clause (d). AND AMEND to provide greater flexibility for nitrogen emissions (only)	Support in part Oppose in part	FFNZ considers that reasonable flexibility should be provided and PC1 should not prescribe input parameters for alternative methods. Therefore it does not agree with this part of the submission point if it does not provide for sufficient flexibility.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>from sheep/beef/deer operations on steep land. AND ADD a Rule for OVERSEER or enable other models to the same quality standards. AND AMEND clause (c) to provide for the 'most current version' of any model approach. AND AMEND to clarify the process for approval of cropping/agricultural impact models.</p>		<p>FFNZ supports the use of farm specific and location specific inputs as opposed to standard or default inputs.</p> <p>FFNZ supports changes to provide greater flexibility for nitrogen and refers to its submission on Variation 1, including amendments to Rule 2 to allow low nitrogen farms to increase to 15kgN or a permitted baseline as a permitted activity.</p> <p>FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults and to change the benchmarking period and adopt a five year rolling average. FFNZ considers that amendments to Schedule B are required to reflect this and refers to the changes set out in its submission on Variation 1.</p> <p>FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.</p> <p>FFNZ agrees that clarity around the process for approval of cropping/agricultural impact models would be helpful.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Primary Land Users Group Submitter ID: 71427	PC1-11180	Schedule B	DELETE Schedule B AND REPLACE with a schedule detailing requirements for a Sub-Catchment Management Plan.	Support in part Oppose in part	<p>FFNZ considers that Schedule B ought to be retained if it is amended as set out in FFNZ's submission on Variation 1, along with the other amendments proposed e.g. flexibility for low nitrogen discharges to increase to 15kgN as a permitted activity, controlled activity for those who want to increase nitrogen but are above 15kgN etc. If these changes are not made, FFNZ considers that Schedule B ought to be deleted as proposed.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ does not support a schedule of requirements for sub-catchment management plans because it considers this is appropriate addressed through the methods as amended by its submission on Variation and because it is concerned that such an approach would lead to property level allocation (which FFNZ opposed, see its submission on Variation 1).</p>
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-9841	Schedule B	AMEND Schedule B provisions to focus on a sub-catchment management approach that addresses all four contaminants AND REMOVE the Nitrogen Reference Point AND REMOVE the use of the OVERSEER Model for commercial vegetable production systems and recognise the limitations of Overseer as a regulatory tool.	Support in part Oppose in part	<p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ also supports an approach that is consistent across all four contaminants and effects based (see its submission on Variation 1).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that this flexibility could provide for commercial vegetable production systems as proposed by this submitter.</p>
Raukawa Charitable Trust Submitter ID: 74073	PC1-10599	Schedule B	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period (specified in clause f)... f. The reference period is <u>an average of the five years between the five financial years spanning 2011/12 to 2015/16 (as consistent with the five year rolling average in 5(a) in Schedule 1)</u> the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable..." AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second	Oppose in part Support in part	<p>FFNZ considers the highest nitrogen leaching loss (not the average as proposed by this submitter) ought to be adopted for reasons including that this would provide greater flexibility and recognition of anomalies e.g. drought or downturn in dairy pay out.</p> <p>FFNZ considers that the reference period ought to be extended to a 10 year period and refers to its submission on Variation 1. But in the even that is not successful it would support a five year period and a five year rolling average.</p> <p>FFNZ agrees that there ought to be the option in Table 1 to use actual data as opposed to defaults and agrees to amendments to Table 1 to provide for this.</p> <p>FFNZ supports clarity or consistency in calculating the 75th percentile but is not sure of the practical effect of the submitter's proposed amendments to this column. FFNZ would support it if it resulted in a</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>column: "Use 'no differences between blocks' with the following exceptions:</p> <ul style="list-style-type: none"> (ADD a third bullet point) <u>Where the farm has verifiable farm operational data that is capable of showing the relative use of various blocks on the farm by different classes of livestock.</u>" <p>ADD to the third Column, the words: <u>"Where verification is possible relative difference should be allowed to be used to encourage smart land use and production systems consistent with Policy 5."</u></p> <p>Animal weights, second column, "Only use OVERSEER defaults - do not enter in weights and... (national averages). <u>Except where the farm has verifiable digital data of stock weights at the appropriate times.</u>"</p> <p>Third column, "<u>Accurate animal weights are difficult to obtain and prove but those operators who manage and collect verifiable weights should be able to use them.</u>"</p> <p>Soil description, second column, "<u>For dairy systems Use Soil Order - obtained from S-Map or where S-Map is unavailable from LRI 1:50,000 data or a soil map of the farm. For all other land uses use the best verifiable information available.</u>"</p>		<p>reasonable, consistent, fair, practical, affordable and cost effective outcome.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			ADD to the third column "To ensure consistency between areas... that don't <u>for the purposes of developing the Nitrogen Reference Point 75th percentile.</u> "		
Ravensdown Limited Submitter ID: 74058	PC1-10165	Schedule B	<p>RETAIN the intent of Schedule B. AND AMEND as follows:</p> <p>"a. The Nitrogen Reference Point must be calculated by a Certified Farm Nutrient Management Advisor to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point shall be determined through the Rule 3.11.5.7 consent process.</p> <p>c. The Nitrogen Reference Point must be calculated using the current version of the OVERSEER Model <u>and OVERSEER Best Practice Data Input Standards</u> (or any other model approved by the Chief Executive of the Waikato Regional Council).</p> <p>d. ...it must be calculated using <u>the current version of the OVERSEER Best Practice Data Input Standards 2016</u>, with the exception...</p> <p>f. The reference period is the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016 <u>average of</u></p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ would support the change in terminology to Certified Nutrient Management Advisor provided that this does not unreasonably reduce the pool of people available to prepare NRPs or increase the cost to farmers or make compliance more stringent.</p> <p>FFNZ supports the use of Overseer best practice data input standards but considers that there ought to be provision to use alternative standards, including actual numbers, where appropriate.</p> <p>FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.</p> <p>FFNZ agrees that the reference period ought to be amended. As set out in FFNZ's submission on Variation 1 it considers that ought to be a 10 year period but in the event that submission point is not successful it would support the 12/13 to 15/16 years proposed by this submitter. However, FFNZ considers it ought to be the highest nitrogen discharge number not the average because that</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>the previous – year period (12/13 – 15/16)."</u> AND ADOPT the definitions sought in this submission relating to certification programmes.</p>		would unduly penalise those who had anomalies e.g. one year is low due to flooding or destocking as a result of something like a marriage separation.
Rotorua Lakes Council Submitter ID: 73373	PC1-2533	Schedule B	<p>AMEND Schedule B to include caps based primarily on the ability of the land to attenuate contaminant leaching by tying limits to the land's Land Use Capability class. AND MAKE any consequential amendments.</p>	Oppose	<p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p>
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5717	Schedule B	<p>Schedule B: REMOVE (Nitrogen Reference Point- Schedule B) the use of the OVERSEER Model or any other measuring tool in PPC1 until it is accurate both relatively and absolutely AND DELETE the use of benchmarking or allocation AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves AND research a series of mitigations with strong data to support their efficacy and help introduce them. These will in combination with</p>	<p>Support in part Oppose in part</p>	<p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation.</p> <p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>pollution levies have the greatest and fastest effect on water pollution. Allocation REMOVE the use of allocations or benchmarking AND AMEND to use pollution levies based on the outputs above the assimilative capacity of land AND REPLACE the use of Overseer with a measuring system that works.</p>		<p>GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that public funding ought to be available for public benefit and that a polluter pays or tax or levy approach has issues including that it is a blunt instrument, not suited for diffuse discharges (which cannot be easily measured or observed or turned off/stopped) and this would likely impose significant cost for no net benefit.</p>
<p>Southern Fresh Foods Ltd Submitter ID: 71408</p>	<p>PC1-1209</p>	<p>Schedule B</p>	<p>AMEND Schedule B to remove a Nitrogen Reference Point per entity from the plan AND REPLACE with a Nitrogen Reference Point per crop that reduces 10% over 10 years to a level that is an industry accepted standard for each specific crop AND AMEND to provide for the establishment of an alternative methods or model, which has the capacity to deal with the complexity levels needed.</p>	<p>Support in part Oppose in part</p>	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not support allocation for reasons including there is no equitable or reliable basis to allocate and it will likely impose significant cost for no net benefit. Accordingly, FFNZ opposes the proposal to establish a NRP per crop and require a 10% reduction for reasons including that this is effectively an allocation approach, is not tailored to individual situations and sub-catchment characteristic and as set out in FFNZ's submission on Variation 1, FFNZ is concerned that nitrogen is the lease of the issues and this does not justify the significant cost such an approach would likely impose.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					FFNZ supports the development of other models and the flexibility to be able to use these in PC1.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11194	Schedule B	AMEND PPC1 to include provision for the establishment of an auditing procedure or other mechanism which ensures the accuracy and reliability of the input data and use of the OVERSEER Model for the purposes of establishing a Nitrogen Reference Point. For example, through the Farm Environment Plan process.	Support in part	FFNZ agrees that the input data needs to be as accurate or reliable as possible. FFNZ also considers that appropriate flexibility needs to be provided to enable the use of other models or mitigations outside of Overseer or for other input standards or actual data.
South Waikato District Council Submitter ID: 72892	PC1-4161	Schedule B	AMEND Schedule B to provide an effects based approach to contaminant management including nitrogen leaching AND AMEND Schedule B to read: "A property or enterprise with a cumulative area greater than 20 hectares (or any property or enterprise used for commercial vegetable production) must have a nitrogen Reference Point calculated as follows..." AND AMEND to provide evidence that the section 32 evaluation confirms clause a and Table 1 are the preferred approach to adopt and there are appropriately qualified and experienced professionals able to provide this information.	Support in part Oppose in part	FFNZ supports an effects based approach to managing contaminants. It also supports an approach that is consistent across all four contaminants and refers further to its submission on Variation 1. FFNZ considers that the NRP ought to apply to properties above 20ha not 10ha as proposed for reasons including that FFNZ is concerned that this would impose significant cost for no net benefit. FFNZ agrees that a robust section 32 assessment needs to be presented for Schedule B.
Stark, Steven and Theresa Submitter ID: 73721	PC1-5205	Schedule B	AMEND Schedule B to add the following: <u>"Farmers will farm to best practice. OVERSEER will be used as an informative, not regulatory, tool at the</u>	Support in part Oppose in part	FFNZ supports the use of Overseer as a decision support tool and not as a regulatory tool. However, FFNZ has concerns that the words chosen by the submitter will result in an input control approach to hold the farm at "best practice Overseer" and that this will be as bad or if not worse that being required

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>property level to assist in information gathering for future plan changes."</u>		to farm to an Overseer number. FFNZ considers that the first part of the proposed amendment is not needed if farmers obtain tailored and proportionate FEPs and farm generally in accordance with them (see FFNZ's submission on Variation 1).
Stobie, Duncan, Loraine, Donald and Craig Submitter ID: 73998	PC1-5146	Schedule B	AMEND Schedule B to cover nitrogen by an input output system with pasture and cropping and the use of best practice. AND AMEND to use a system called NCheck, which is used in Canterbury. REMOVE section (g)(i) of Schedule B.	Oppose in part	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not support allocation or an input control approach and is concerned that the proposal may result in a similar approach.</p> <p>FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports flexibility to consider models other than Overseer.</p> <p>FFNZ considers that clause g(i) ought to remain but that it should be clarified so that financial or confidential data is not required to be provided and</p>

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					stock numbers can be taken out of annual accounts and provided separately.
Taupo District Council Submitter ID: 74207	PC1-8169	Schedule B	Ensure that Taupō District Council is involved in the development of the allocation framework. Schedule B.	Oppose	FFNZ opposes an allocation regime and only supports Schedule B on the basis that the NRP is not used to allocate nitrogen and amendments are made as set out in FFNZ's submission on Variation 1 (including adoption of a reasonable policy and rule framework for increase in nitrogen).
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9362	Schedule B	DELETE from Schedule B the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.	Support in part Oppose in part	FFNZ considers that Schedule B ought to be retained if it is amended as set out in FFNZ's submission on Variation 1, along with the other amendments proposed e.g. flexibility for low nitrogen discharges to increase to 15kgN as a permitted activity, controlled activity for those who want to increase nitrogen but are above 15kgN etc. FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool (as opposed to a regulatory tool) and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11815	Schedule B	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive	Oppose in part Support in part	FFNZ considers the highest nitrogen leaching loss (not the average as proposed by this submitter) ought to be adopted for reasons including that this would provide greater flexibility and recognition of anomalies e.g. drought or downturn in dairy pay out. FFNZ considers that the reference period ought to be extended to a 10 year period and refers to its submission on Variation 1. But in the even that is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>months) within the reference period (specified in clause f)... f. The reference period is an average of the five years between the five financial years spanning 2011/12 to 2015/16 (as consistent with the five year rolling average in 5(a) in Schedule 1) the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable... AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions:</p> <ul style="list-style-type: none"> (ADD a third bullet point) <u>Where the farm has verifiable farm operational data that is capable of showing the relative use of various blocks on the farm by different classes of livestock.</u> <p>ADD to the third Column, the words: <u>"Where verification is possible relative difference should be allowed to be used to encourage smart land use and production systems consistent with Policy 5."</u> Animal weights, second column, "Only use OVERSEER defaults - do not enter in weights and... (national averages). <u>Except where the farm has verifiable digital data of stock weights at the appropriate times.</u>"</p>		<p>not successful it would support a five year period and a five year rolling average.</p> <p>FFNZ agrees that there ought to be the option in Table 1 to use actual data as opposed to defaults and agrees to amendments to Table 1 to provide for this.</p> <p>FFNZ supports clarity or consistency in calculating the 75th percentile but is not sure of the practical effect of the submitter's proposed amendments to this column. FFNZ would support it if it resulted in a reasonable, consistent, fair, practical, affordable and cost effective outcome.</p>

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			<p>Third column, "<u>Accurate animal weights are difficult to obtain and prove but those operators who manage and collect verifiable weights should be able to use them.</u>"</p> <p>Soil description, second column, "<u>For dairy systems Use Soil Order - obtained from S-Map or where S-Map is unavailable from LRI 1:50,000 data or a soil map of the farm. For all other land uses use the best verifiable information available.</u>"</p> <p>ADD to the third column "To ensure consistency between areas... that don't <u>for the purposes of developing the Nitrogen Reference Point 75th percentile.</u>"</p>		
TerraCare Fertilisers Limited Submitter ID: 73066	PC1-10493	Schedule B	<p>AMEND Schedule B to support science which provides viable alternatives to superphosphate AND collate all data regarding solubility and factor into the OVERSEER Model or any other tool used to more accurately assess the nutrient output of an enterprise AND CLARIFY the meaning of the outputs in relation to risk of freshwater contamination AND AMEND to use Overseer as a guide to best management practices not a regulatory tool AND publish Overseer so it can be peer reviewed by other modellers AND MAKE the peer review commentary publicly available if this has been conducted AND</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports an approach that is consistent across all four contaminants, does not use the NRP to grandparent, does not use Overseer as a regulatory tool and provides flexibility for alternatives to Overseer including different models, input standards, recognition of mitigations outside of Overseer (see FFNZ's submission on Variation 1).</p> <p>FFNZ would support factoring other data into Overseer but only on the basis that this is not used to allocate e.g. incorporation of superphosphate should not be used to justify or inform an approach that seeks to allocate phosphorous.</p> <p>FFNZ considers that Overseer should be a guide (but it is not necessarily BMP and BMP is not necessarily the best option or goal) and agrees it should not be used as a regulatory tool.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			NOTIFY what the inherent errors are within the model.		FFNZ supports peer review of Overseer and better science and information to make it more robust.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8451	Schedule B	AMEND Schedule B(b) to the average annual nitrogen loss, not the highest.	Oppose	FFNZ considers that it ought to be the highest nitrogen loss and not the average for reasons including that farmers should not be penalised for unexpected or one off or unusual events that lower nitrogen in a particular year e.g. flood, yet this would happen if an average approach was adopted.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10554	Schedule B	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period (specified in clause f)... f. The reference period is <u>an average of the five years between the five financial years spanning 2011/12 to 2015/16 (as consistent with the five year rolling average in 5(a) in Schedule 1)</u> the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable..." AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions: <ul style="list-style-type: none"> (ADD a third bullet point) <u>Where the farm has verifiable farm operational data that is capable of showing the</u> 	Oppose in part Support in part	FFNZ considers the highest nitrogen leaching loss (not the average as proposed by this submitter) ought to be adopted for reasons including that this would provide greater flexibility and recognition of anomalies e.g. drought or downturn in dairy pay out. FFNZ considers that the reference period ought to be extended to a 10 year period and refers to its submission on Variation 1. But in the even that is not successful it would support a five year period and a five year rolling average. FFNZ agrees that there ought to be the option in Table 1 to use actual data as opposed to defaults and agrees to amendments to Table 1 to provide for this. FFNZ supports clarity or consistency in calculating the 75 th percentile but is not sure of the practical effect of the submitter's proposed amendments to this column. FFNZ would support it if it resulted in a reasonable, consistent, fair, practical, affordable and cost effective outcome.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>relative use of various blocks on the farm by different classes of livestock.</u></p> <p>ADD to the third Column, the words: <u>"Where verification is possible relative difference should be allowed to be used to encourage smart land use and production systems consistent with Policy 5."</u></p> <p>Animal weights, second column, <u>"Only use OVERSEER defaults - do not enter in weights and... (national averages). Except where the farm has verifiable digital data of stock weights at the appropriate times."</u></p> <p>Third column, <u>"Accurate animal weights are difficult to obtain and prove but those operators who manage and collect verifiable weights should be able to use them."</u></p> <p>Soil description, second column, <u>"For dairy systems Use Soil Order - obtained from S-Map or where S-Map is unavailable from LRI 1:50,000 data or a soil map of the farm. For all other land uses use the best verifiable information available."</u></p> <p>ADD to the third column <u>"To ensure consistency between areas... that don't for the purposes of developing the Nitrogen Reference Point 75th percentile."</u></p>		
Waikato and Waipa River Iwi	PC1-3530	Schedule B	AMEND Schedule B to read: "A property or enterprise with a...	Oppose in part	FFNZ considers the highest nitrogen leaching loss (not the average as proposed by this submitter)

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Submitter ID: 74035			<p>b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period (specified in clause f)...</p> <p>f. The reference period is an average of the five years between the five financial years spanning 2011/12 to 2015/16 (as consistent with the five year rolling average in 5(a) in Schedule 1) <u>the two financial years covering 2014/2015 and 2015/2016,</u> except for commercial vegetable..."</p> <p>AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions:</p> <ul style="list-style-type: none"> • (ADD a third bullet point) <u>Where the farm has verifiable farm operational data that is capable of showing the relative use of various blocks on the farm by different classes of livestock."</u> <p>ADD to the third Column, the words: <u>"Where verification is possible relative difference should be allowed to be used to encourage smart land use and production systems consistent with Policy 5."</u></p>	Support in part	<p>ought to be adopted for reasons including that this would provide greater flexibility and recognition of anomalies e.g. drought or downturn in dairy pay out.</p> <p>FFNZ considers that the reference period ought to be extended to a 10 year period and refers to its submission on Variation 1. But in the even that is not successful it would support a five year period and a five year rolling average.</p> <p>FFNZ agrees that there ought to be the option in Table 1 to use actual data as opposed to defaults and agrees to amendments to Table 1 to provide for this.</p> <p>FFNZ supports clarity or consistency in calculating the 75th percentile but is not sure of the practical effect of the submitter's proposed amendments to this column. FFNZ would support it if it resulted in a reasonable, consistent, fair, practical, affordable and cost effective outcome.</p>

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			<p>Animal weights, second column, "Only use OVERSEER defaults - do not enter in weights and... (national averages). <u>Except where the farm has verifiable digital data of stock weights at the appropriate times.</u>"</p> <p>Third column, "Accurate animal weights are difficult to obtain and <u>prove but those operators who manage and collect verifiable weights should be able to use them.</u>"</p> <p>Soil description, second column, "<u>For dairy systems Use Soil Order - obtained from S-Map or where S-Map is unavailable from LRI 1:50,000 data or a soil map of the farm. For all other land uses use the best verifiable information available.</u>"</p> <p>ADD to the third column "To ensure consistency between areas... that don't <u>for the purposes of developing the Nitrogen Reference Point 75th percentile.</u>"</p>		
Waikato Dairy Leaders Group Submitter ID: 74049	PC1-11269	Schedule B	RETAIN the Schedule B requirement for properties and enterprises over 20 hectares to calculate a Nitrogen Reference Point.	Support in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
<p>Waikato District Council (WDC) Submitter ID: 73418</p>	<p>PC1-3119</p>	<p>Schedule B</p>	<p>REVIEW AND AMEND all relevant PPC1 provisions to:</p> <p>AMEND Schedule B to ensure it is explicit about how the Nitrogen Reference Point is to be used in rules applying for the first decade, and how it could be applied in future decades (additional Healthy River plan changes);</p> <p>AND CONSIDER the introduction of Nitrogen Emission Constraint (NEC) methodology as part of future plan changes at least, and;</p> <p>AND AMEND to provide greater clarity and alignment between statements concerning Nitrogen Reference Point in the rules and Schedule 1. The reason for this is the expectation is that Nitrogen Reference Point will increase in importance through time under Healthy Rivers plan changes (i.e. further reductions required), therefore it is important to get clarity now.</p> <p>AND AMEND Schedule B(c), with the following, or wording with a similar intention:</p> <p>"The Nitrogen Reference Point must be calculated using the current version of the OVERSEER Model (or</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that the use of the NRP ought to be clarified. FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not support a NEC policy for reasons including that it is premature to pre-determine the approach or methodology for the next plan change when there are a lot of uncertainties and the purpose of the first 10 years is to better understand the catchment and effects activities and mitigations. FFNZ opposes allocation (see reasons in this document, FFNZ's submissions on PC1 and Variation 1). and an NEC approach would be a form of allocation.</p> <p>FFNZ considers that the clarity the submitter seeks about the relationship between the NRP, Rules and Schedule 1 ought to clarify that it does not grandparent properties nor is it used to inform an allocation approach nor has it been determined that an allocation approach will be adopted or necessary.</p> <p>FFNZ supports the proposed wording for paragraph c on the basis that it provides for flexibility to use different approaches where Overseer is under or over estimating nitrogen discharges.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			any other model approved by the Chief Executive of the Waikato Regional Council). <u>OVERSEER results can be adjusted where there are scientific reasons to believe the model is over or underestimating nitrogen emissions.</u> "		
Waikato Environment Centre Submitter ID: 73436	PC1-6241	Schedule B	AMEND Schedule B to provide for load allocation approaches that are equitable, promote efficient resource use, future proofed and promote sustainable management. AND AMEND to provide for the use of the Land Use Capability classification system.	Oppose	FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.
Waikato Focus on Peat Group Submitter ID: 72148	PC1-5522	Schedule B	AMEND Schedule B to use the nitrogen loss figure generated per farm, according to the conditions on that farm (not according to previous usage information). AND AMEND PPC1 to invest more in science prior to making policy.	Support in part Oppose in part	FFNZ supports robust science and investing further in the science. FFNZ opposes the proposal to generate a nitrogen loss figure per farm not previous usage information because it is difficult to see how that would work in practice. FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).
Waikato Regional Council	PC1-3553	Schedule B	AMEND Schedule B to remove the ability for an enterprise to hold a Nitrogen Reference Point, and restrict	Support in part	FFNZ considers that flexibility ought to be provided for an enterprise to hold an NRP or for it to be on a property basis. However, it acknowledges that this

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 72890			<p>the Nitrogen Reference Point to exist only in association with a particular parcel or property.</p> <p>AND AMEND to clarify whether it is the current, intended, or previous land use that determines the appropriate nitrogen reference period to use.</p> <p>AND AMEND clause a. to read: "The Nitrogen Reference Point must be calculated <u>approved</u> by a Certified Farm Nutrient Advisor..."</p> <p>AND AMEND clause b. to read: "The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single <u>financial year</u> (being 12 consecutive months) within the reference..."</p> <p>AND AMEND clause d. to read: "...and where the OVERSEER® Model is used, it must be calculated using the Overseer® Best Practice Data input standards 2016 <u>that relate to the version of the Overseer® model being used</u>, with the exceptions and inclusions set out in schedule B table 1."</p> <p>AND AMEND clause f. to read: "The <u>Nitrogen Reference Period</u> is the two... except <u>where the primary land use is</u> for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016 <u>or such lesser, relevant period if the land was used for</u></p>	Oppose in part	<p>would require an appropriate process for subdivision or transfer of part of NRPs and considers that this can be reasonably provided for.</p> <p>FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.</p> <p>FFNZ supports the change to require an NRP to be "approved" by a CFNA because that provides for calculation by others and a verification process. This will reduce cost and bureaucracy.</p> <p>FFNZ opposes the change to financial year and considers it ought to be the highest leaching loss in any continuous 12 month period.</p> <p>In principle, FFNZ agrees that input standards ought to relate to the version of Overseer model being used but considers that flexibility ought to be provided to use different versions or input standards where appropriate (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that the reference period ought to be amended. As set out in FFNZ's submission on Variation 1 it considers that ought to be a 10 year</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>commercial vegetable production during only part of that period.</u> AND AMEND Schedule B clause g. to read: "...</p> <p>i. Stock numbers as recorded in annual accounts together with stock sale and purchase invoice<u>Records of stock numbers and stock classes, births and deaths, stock movement on and off the property, grazing records and transport records;</u></p> <p>ii. Dairy production data;</p> <p>iii. Invoices for fertiliser applied to the land<u>Records of fertiliser type and amount, application rates and fertiliser placement records;</u></p> <p>iv. Invoices for<u>Records of feed supplements and amount sold or purchased, and records of supplements grown and fed on farm;</u></p> <p>v. Water use records for irrigation (to be averaged over 3 years or longer) in order to determine irrigation application rates <u>mm/ha/month per irrigated block, and proof of areas irrigated (for Overseer® block setup);</u></p> <p>vi. Records of crops grown on the land<u>and grazed including area and yield, and including cultivation and sowing records where available; and</u></p> <p>vii. <u>A map detailing the location and area of land used for effluent irrigation;</u></p> <p>viii. iv. Horticulture crop diaries and NZGAP records.</p> <p>ix. <u>Soil test data – including anion</u></p>		<p>period or lesser where the land was only used for part of that period.</p> <p>FFNZ considers the amendment to paragraph g(i) to (vii) and (ix) to (xi) are too onerous and will likely cause significant cost for no net benefit. It is also difficult to see how the information relates to an environmental outcome or the purpose of PC1. If the submission point is allowed (and FFNZ considers it should not be) then FFNZ considers that clear limitations ought to be placed on the purpose for which the information will be used and the privacy and confidentiality of the information needs to be maintained.</p> <p>FFNZ supports flexibility for use of other models and considers it appropriate that the parameters of other models are approved by the CE of WRC provided that such approval is not unreasonably withheld.</p>

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			<p><u>storage capacity</u> x. <u>A map detailing the property boundaries, areas including block (management) areas and retired areas, and the total area of non-productive areas; and</u> xi. <u>Certificate of title and legal description.</u>" AND ADD an advice note to read: "<u>Advice note: For the avoidance of doubt, financial information contained within the above records may be redacted (blacked out) prior to it being provided to Waikato Regional Council.</u>" AND AMEND Schedule B Table 1 by deleting the existing Table 1 and replace with the new Table 1 in Appendix A to the submission. AND AMEND Schedule B clause d to read: "...with the <u>settings that must be used complying with exceptions and inclusions set out in</u> Schedule B Table 1. <u>Where another approved model is used, it will conform to the data input standards as approved by the Chief Executive of the Waikato Regional Council.</u>"</p>		
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11384	Schedule B	AMEND Schedule B(c) to read: "The Nitrogen Reference Point must be calculated using <u>either</u> the current version of the OVERSEER <u>or the APSIM or the SPASMO</u> model (or any other model approved by the Chief Executive of the Waikato Regional Council). "	Support in part Oppose in part	FFNZ supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). Therefore it agrees with

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND Schedule B(d) to read: "The Nitrogen Reference Point data shall comprise the electronic output file from <u>either</u> the OVERSEER <u>or</u> the <u>APSIM or the SPASMO Model or</u> other approved model, and where the OVERSEER Model is used, it must be calculated using the OVERSEER Best Practice Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B Table 1." AND AMEND Schedule B(f) to read: "There reference period is the two financial years covering 2014/2015 and 2015/2016 (<u>including any currently planned or consented future land use</u>), except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016."</p>		<p>changes to refer to APSIM or SPASMO but considers that the ability to use other models needs to be provided for so does not agree to the deletion of the words beginning "(or any other model ..."</p> <p>In the absence of modelling or information to substantiate the impacts of the proposal to include currently planned or consented future land use, or an assessment of how that would be assessed and applied, FFNZ does not support the proposal.</p>
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2146	Schedule B	<p>AMEND Schedule B to incorporate the Nitrogen Reference Point and use in Farm Environment Plans as a Best Practice Management Tool. AND develop protocols for the use of actual input data for the OVERSEER Model. AND CLARIFY how new versions of Overseer will be handled and which version Schedule B is based on.</p>	<p>Support in part Oppose in part</p>	<p>In principle FFNZ supports Schedule B provided that the NRP is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as an on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p>

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					<p>FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that Overseer version change needs to be provided for and relativity or proportionality maintained. FFNZ also considers that flexibility ought to be provided for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.</p>
<p>Waitomo Catchment Trust Board Submitter ID: 73124</p>	<p>PC1-7947</p>	<p>Schedule B</p>	<p>AMEND Schedule B so that Nitrogen Reference Points are calculated on a 5-year reference period, at a property or sub-catchment level, as part of the Farm Environment Plan. AND AMEND to ensure the highest dischargers are required to reduce to the 60th percentile, and very low historical dischargers may increase to the 30th percentile. AND AMEND to ensure that landowners that have previously worked to reduce their discharges have this taken into account when calculating the Nitrogen Reference Point.</p>	<p>Support in part Oppose in part</p>	<p>FFNZ agrees that the reference period ought to be amended. As set out in FFNZ's submission on Variation 1 it considers that ought to be a 10 year period but in the event that submission point is not successful it would support the five years proposed by this submitter.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers an obligation to reduce to the 60th percentile would be too onerous and impose significant cost for no net benefit. It considers that flexibility ought to be provided for low emitters to increase up to 15kgN or an appropriate permitted baseline (see FFNZ's submission on Variation 1)</p>

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					<p>but is concerned that the 30th percentile is not an appropriate permitted baseline.</p> <p>FFNZ agrees that historical actions to reduce nitrogen need to be recognised and provided for.</p>
<p>Waitomo District Council Submitter ID: 73688</p>	<p>PC1-10341</p>	<p>Schedule B</p>	<p>AMEND Schedule B discharge provisions to take account of sub-catchment differences AND REPLACE the Nitrogen Reference Point catchment-wide approach with a sub-catchment planning and management alongside the implementation of robust Farm Environment Plans.</p> <p>AND REMOVE the use of modelled (the OVERSEER Model) numerical values of nitrogen discharges to determine resource consent status and compliance with standards AND CONSIDER the risks cost and benefits of Overseer in more detail AND AMEND to replace the nitrogen management provisions with an emphasis on Farm Environment Plans and robust sub-catchment planning and management.</p> <p>AND CLARIFY how Phosphorus is being measured in the Waipā Freshwater Management Unit.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that PC1 ought to take into account sub-catchment differences but considers that this can be addressed through an appropriate policy and rule framework (as proposed in FFNZ's submission on Variation 1 e.g. amendments to the FMU or spatial scale for calculating the 75th percentile, flexibility to increase nitrogen) as opposed to change in Schedule B.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1. It also supports the NRP as long as it is used as a reference point and not to allocate nitrogen and as long as there is flexibility to increase and flexibility in the use of Overseer and other models.</p> <p>FFNZ agrees that Overseer numbers should not be used for compliance. FFNZ agrees the risks and costs ought to be considered in detail.</p> <p>FFNZ considers there needs to be a reasonable balance of nitrogen management and sub-catchment planning.</p> <p>FFNZ considers that phosphorous should not be measured using TP or the lake measurement and considers that any measurement ought to be reasonable (FFNZ refers to its submission on</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					Variation 1 and in particular its concerns with the 80 year targets and the TP targets for the main stem).
Wiremu Trust Submitter ID: 73969	PC1-8856	Schedule B	AMEND Schedule B to use all farm Nitrogen Reference Point data and average it on a per hectare basis, and use this as a catchment or sub-catchment reference. AMEND Schedule B (g)(i) to the Lincoln 2003 stock unit definition of a 450kg dairy cow producing 385 kgMS as 8.4 stock units. AMEND Schedule B, Table 1, Farm Model to leave non-contiguous properties that are part of the same enterprise as separate entities.	Support in part Oppose in part	FFNZ agrees that the NRP ought to be averaged across a farm but that it ought to also be calculated on a whole property (not effective area) basis and flexibility to do this across farm enterprises or at an individual property level ought to be provided. FFNZ considers that actual stock data ought to be provided and if the proposed Lincoln 2003 definition of stock unit is appropriate then FFNZ would support it. FFNZ considers that there should be the option to treat non continuous properties as part of the same enterprise or as separate entities.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11022	Schedule C	AMEND Schedule C(1) to read: "The water bodies must be fenced to exclude cattle, horses, deer and pigs, unless those animals are prevented from entering the bed of the water body by a stock proof natural barrier, including constructed barriers, formed by topography or vegetation."	Support in part	FFNZ agrees that all reasonable options for stock exclusion ought to be provided for including constructed barriers. However, FFNZ considers that Schedule C requires significant further amendment because as drafted it is very likely to impose significant cost for no net benefit.
Auckland Council Submitter ID: 73518	PC1-9140	Schedule C	AMEND Schedule C to provide for sheep and goats to be excluded from waterways OR DELETE the identification of types of animals within the rules and insert a definition of livestock to include sheep and goats in the glossary.	Oppose	FFNZ considers that the cost of excluding sheep and goats would be significant, unreasonable and excluding them is unlikely to result in any noticeable environmental benefit. Therefore FFNZ opposes the proposal to require them to be excluded from waterways.
Auckland Regional Public Health Service	PC1-10181	Schedule C	AMEND Schedule C to require stock exclusion much sooner.	Oppose	The stock exclusion requirements are likely to result in significant cost and reasonable time ought to be provided to comply with them.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 71612					
Bailey, James Submitter ID: 73926	PC1-9050	Schedule C	AMEND Schedule C to make stock exclusion consistent with central Government's recommendations being proposed through the advice of the Land and Water Forum AND AMEND to place a strong emphasis on identifying and addressing critical source areas through the farm planning process AND AMEND to use the sub-catchment approach by incentivising the development of catchment groups to work alongside Council to identify and target contaminant hot spots.	Support in part Oppose in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation. FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1. FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-7091	Schedule C	AMEND Schedule C to have the same setback (3 metres) as Rule 3.11.5.2(3)(e). AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	Oppose	FFNZ considers that a 3m setback is too stringent for a minimum standard. FFNZ supports a 1m setback as a reasonable minimum standard with the ability to consider more stringent setbacks as part of an assessment of critical source areas in FEPs (which FFNZ says should be guided by the MPA framework set out in its submission on Variation 1).
Balle Bros Group Submitter ID: 67834	PC1-11434	Schedule C	AMEND Schedule C to read: "...2. New fences installed after 22 October 2016 must be located to ensure	Support in part	FFNZ supports the proposal to identify stock exclusion through the FEP process. FFNZ considers that this could be reasonably assessed

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>cattle, horses, deer and pigs cannot be within one metre of the bed of the water body (excluding constructed wetlands) <u>are installed in accordance with Schedule 1 requirements.</u></p> <p>3. Livestock must not be permitted to enter onto or pass across the bed of the water body, except when using a livestock crossing structure <u>or where stock is moved in one continuous movement and this occurs less frequently than once per week.</u></p> <p>...</p> <p>Water bodies from which cattle, horses, deer and pigs must be excluded:</p> <p>i. Any river that continually contains surface water and <u>exceeds 1m wide at any point and is 30cm deep on average.</u></p> <p>ii. Any drain that continually contains surface water <u>exceeds 1m wide at any point and is 30cm deep on average.</u></p> <p>...</p> <p>Exclusions: The following situations are excluded from clauses 1 and 2:</p> <p>I. <u>Areas with slopes exceeding 15 degrees and where no break feeding occurs</u></p> <p>II. Where the entry onto or passing across the bed of the water body is by horses that are being ridden or led.</p>	Oppose in part	<p>through a critical source area assessment and provided there is consideration of the resources reasonably available to the farm enterprise (as provided for in the MPA framework proposed in FFNZ's submission on Variation 1).</p> <p>FFNZ supports a reasonable stock crossing provision.</p> <p>FFNZ agrees with the amendments to water bodies because it considers that they ought to be based on accord water bodies.</p> <p>FFNZ prefers an approach that is not based on slope (as this is more certain) and proposes a stock unit approach in its submission on Variation 1. However, it would support a narrative approach in the alternative and in the event that its submission is not successful.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			III. Where entry onto or passing across the bed of the water body is by a feral animal."		
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11507	Schedule C	AMEND Schedule C to apply to land with a slope up to 15° (flat and rolling land). AND AMEND to exclude stock when break fed on land with a slope greater than 15 degrees. AND DELETE Schedule C (3) AND REPLACE with: <u>"Cattle, deer and pigs are able to enter water bodies for the purpose of crossing from one side to the other as long as they are being supervised and are actively driven across the water body in one continuous movement, where this occurs less frequently than once per week. Stock crossings used once or more per week, must use a livestock crossing structure."</u>	Support in part Oppose in part	FFNZ does not support a slope approach for reasons including that this is uncertain and impractical and prefers a stock unit or similar approach (see FFNZ's submission on Variation 1). However, it would support a narrative approach (e.g. break feeding) in the alternative and in the event that its submission is not successful. FFNZ would support a reasonable stock crossing provision and agrees with the proposed change to paragraph 3.
Carey, Rita Anne Submitter ID: 74006	PC1-3201	Schedule C	AMEND Schedule C so that retired land is compensated for and maintained by the Council AND provide as a tax deductible expense all works enforced by the Council AND calculate a farm average distance so that a fence can be further back or closer depending on the site characteristics. Wetland should be fenced with no setback AND CONSIDER waterholes and dams as beneficial for the environment	Support in part Oppose in part	FFNZ supports the availability of funding and consideration of the resource reasonably available to the farm enterprise, considers that public funding should be available for public good and that incentives ought to be provided for environmental gains. FFNZ supports a tailored approach that tailors mitigations to the particular farm enterprise. FFNZ agrees that waterholes and dams ought to be provided for e.g. stock should not be excluded and the benefits should be acknowledged.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND provide financial assistance with installing regular troughs on farms with natural water where gravity is possible AND AMEND to allow for plenty of machinery access AND AMEND to define the requirements in Schedule 1, A(2)(b)(ii).		
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10805	Schedule C	RETAIN Schedule C as written.	Support in part Oppose in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. However, FFNZ considers that Schedule C requires substantial amendment. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.
Dairy Goat Co-Operative (N.Z) Ltd Submitter ID: 74044	PC1-4135	Schedule C	AMEND PPC1 (Schedule C) so a common term (stock or livestock) is used and defined throughout the document, at least in relation to stock exclusion from water bodies AND AMEND to ensure that the definition (stock or livestock) refers to cattle, horses, deer and pigs, as per Schedule C(1) only.	Support in part Oppose in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. However, FFNZ considers that Schedule C requires substantial amendment. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ would support a reasonable definition of the term stock or livestock to achieve certain, affordable, reasonable and practical minimum standards in Schedule C.</p>
Department of Conservation Submitter ID: 71759	PC1-11055	Schedule C	<p>AMEND Schedule C to require that sheep are excluded from outstanding water bodies, and that cattle, horses, deer and pigs are excluded from all water bodies, including ephemeral water bodies. This should also be reflected throughout Chapter 3.11.</p> <p>AND AMEND Schedule C to require that all new fencing alongside permanent rivers, lakes and outstanding waterbodies be setback at least 10m from the bed of the waterbody and wetlands. For intermittent rivers and wetlands a 5m setback for new fencing is sought.</p> <p>AND AMEND PPC1 permitted and controlled activity rules in accordance with these changes to Schedule C.</p>	Oppose	<p>FFNZ considers that the cost of excluding sheep would be significant, unreasonable and excluding them is unlikely to result in any noticeable environmental benefit. Therefore FFNZ opposes the proposal to require them to be excluded from waterways.</p> <p>FFNZ considers that Schedule C ought to only apply to accord water bodies so does not agree to the inclusion of ephemeral water bodies.</p> <p>FFNZ opposes the requirement for new fencing and 5m and 10m setbacks for reasons including that this will impose significant cost for no net benefit as well as being impractical and unreasonable.</p>
Drummond Dairy Holdings Ltd Submitter ID: 72831	PC1-5660	Schedule C	<p>AMEND Schedule C to adopt the same definition of waterway that is used in the Dairy Accord</p> <p>AND AMEND to require two wire fencing instead of five wire fencing</p> <p>AND AMEND Schedule C as requested by Federated Farmers in their submission.</p> <p>[AMEND Schedule C to ensure that the purpose for which information is being sought is clearly stated</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that Schedule C ought to apply to accord water bodies and stock ought to be excluded so the farmer should have the choice as to how to do that e.g. 2 wire fencing.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND ENSURE that it is within Councils powers to seek all of the information sought in Schedule C AND ENSURE that the information sought by Council is no more than is necessary to achieve the purposes for which it is sought AND ENSURE that the requirements set out in Schedule C match the Policies, Methods, definitions, etc. to which Schedule C relates AND REMOVE requirements for fencing off water bodies AND AMEND to adopt the Government's Clean Water Package 2017 stock exclusion standards as an interim measure AND DEVELOP more detailed proposals at a sub-catchment level later, through a freshwater management unit based assessment, and implemented then through a sub-catchment based plan change AND MAKE any consequential amendments to PPC1.]</p>		
<p>Farmers 4 Positive Change (F4PC) Submitter ID: 73355</p>	<p>PC1-10430</p>	<p>Schedule C</p>	<p>AMEND Schedule C to bring stock exclusion into line with the National Stock Exclusion requirements, which relate to exclusion of cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat land and rolling land, but not on hill country</p>	<p>Support in part Oppose in part</p>	<p>FFNZ is concerned that there are no national stock exclusion requirements and the draft regulations had several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach that is not based on slope but instead based on stock units or a narrative approach (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not support stocking rates or standards for reasons including that this would be an input control approach that would not provide sufficient</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards AND REMOVE any provisions that hold land uses to historic discharge levels or stocking rates.		tailoring and would likely result in significant cost for no net benefit. FFNZ opposes any form of allocation including grandparenting. It only supports the NRP on the basis that it is not used to allocate and flexibility is provided in Overseer or alternative models.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10649	Schedule C	AMEND Schedule C to read: "2. New fences installed after 22 October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within one-three metres of the bed of the water body (excluding constructed wetlands)." AND ADD a third Exclusion after (I) and (II) as follows: " <u>III. Areas with a slope exceeding 25 degrees and where stream fencing is impractical.</u> "	Oppose in part	FFNZ considers that a 3m set back is impractical, unreasonable and significantly expensive. FFNZ considers 1m is appropriate as a minimum standard and that more stringent setbacks could be considered as part of a critical source area assessment in the context of MPA (see FFNZ's submission on Variation 1).
Franklin Waikato Drainage Advisory Subcommittee Submitter ID: 74092	PC1-4067	Schedule C	AMEND Schedule C to have a 0.5 metre setback for all fencing in a drainage district.	Support in part	FFNZ is concerned that the setback requirements in PC1 are too onerous for minimum standards so to the extent that this proposal is less onerous FFNZ would support it.
Gleeson, Graeme B Submitter ID: 73800	PC1-6412	Schedule C	AMEND the timeframes for stock exclusion in Schedule C so that stock is excluded depending on the type of stock, the type of waterway stock is to be excluded from and the degree of slope. AND AMEND Schedule C to specify that slope means the dominant slope of the landscape. i.e. covers 80% or more of the landscape. AND AMEND so that where 80 percent of land is less than or equal	Support in part Oppose in part	FFNZ supports an approach that provides more reasonable timeframes to comply with stock exclusion requirements. FFNZ is concerned that the proposal to base stock exclusion on slope has several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach based on stock units or a narrative description of when stock exclusion is required (see FFNZ's submission on Variation 1). Therefore FFNZ does not support the parts of this proposal that relate to slope.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>to 15 degree slope, stock is excluded from perennial waterways by 2022. AND AMEND so that where 80 percent of land is less than or equal to 15 degree slope, stock is excluded from ephemeral waterways when they flow directly to a main waterway, accepting temporary fencing as a solution. AND AMEND to ensure stock exclusion occurs only in those areas identified as high risk, AND AMEND to ensure that in hill country, where dominant slope is greater than 15 degrees, stock exclusion occurs in critical source areas and where the cattle/deer stocking rate is greater than or equal to 1000kgLW/ha. AND AMEND to ensure the timeframes for stock exclusion align with those proposed nationally. AND AMEND to provide certainty about where and which waters need to be excluded from stock. AND AMEND to ensure that Farm Environment Plans provide mitigation against contaminants relevant to each farm, rather than a blanket approach. AND AMEND to enable stock to enter water bodies if they are being actively managed across the water body, and the water body is not crossed more than once a week.</p>		<p>FFNZ agrees that stock exclusion should only apply to areas identified as high risk and considers that this can be achieved through a critical source area assessment in FEPs (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that reasonable stock crossing ought to be provided for without requiring expensive and impractical stock crossing structures. FFNZ agrees with the proposal for stock to be allowed to cross water if they are being actively managed and it is not more than once a week.</p>

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Hamilton City Council Submitter ID: 74051	PC1-11045	Schedule C	AMEND Schedule C as follows: "Except as provided by Exclusions I., and II., and III., stock must be excluded from the water bodies listed in I. to iv. below as follows:..." [no change to 1. and 2.) "3. Livestock must not be permitted to enter onto or pass across the bed of the water body, except when using a livestock crossing structure." [no change to i. to iv. or I and II] AND ADD <u>"III. Schedule C does not apply to animals at Hamilton Zoo."</u>	Support in part Oppose in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. However, FFNZ considers that Schedule C requires substantial amendment. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation. FFNZ considers that Schedule C ought to apply to animals at the Hamilton Zoo but it should apply to accord water bodies
Hill Country Farmers Group Submitter ID: 73321	PC1-7908	Schedule C	AMEND Schedule C stock exclusion requirement to align with the Align National Policy Statement for Freshwater Management. AND AMEND to provide clear and consistent guidance on stock crossing requirements and slope interpretation for mandatory fencing. AND AMEND Schedule C to read: "...2. New fences installed after 22 October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within one metre of the enter the bed of the water body (excluding constructed wetlands) in accordance with Schedule 1. 3. Livestock must not be permitted to enter onto or pass across the bed of	Support in part Oppose in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. However, FFNZ considers that Schedule C requires substantial amendment. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation. FFNZ is concerned that there are no national stock exclusion requirements and the draft regulations had several issues including the practicality and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>the water body, except when using a livestock crossing structure <u>or where stock is moved in one continuous movement and this occurs less frequently than once per week ...</u></p> <p>Water bodies from which cattle, horses, deer and pigs must be excluded:</p> <p>i. Any river that continually contains surface water and <u>exceeds 1m wide at any point and is 30cm deep on average.</u></p> <p>ii. Any drain that continually contains surface water <u>exceeds 1m wide at any point and is 30cm deep on average. ...</u></p> <p>The following situations are excluded from clauses 1 and 2:</p> <p>I. <u>Areas with slopes exceeding 15 degrees and where no break feeding occurs.</u></p> <p>† II. Where the entry onto or passing across the bed of the water body is by horses that are being ridden or led.</p> <p>‡ III. Where the entry onto or passing across the bed of the water body is by a feral animal.</p> <p>IV. <u>Areas less than 15 degrees demonstrated to be in high flood zones and where fencing is impractical."</u></p>		<p>uncertainty around determining slope. FFNZ prefers an approach that is not based on slope but instead based on stock units or a narrative approach (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that stock ought to not be in the bed of a water body (being accord water bodies) as opposed to within 1m.</p> <p>FFNZ agrees that reasonable stock crossing ought to be provided for without requiring expensive and impractical stock crossing structures. FFNZ agrees with the proposal for stock to be allowed to cross water if they are being actively managed and it is not more than once a week.</p> <p>FFNZ agrees that the exclusion ought to apply to accord water bodies.</p> <p>FFNZ is concerned that the proposal to base stock exclusion on slope has several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach based on stock units or a narrative description of when stock exclusion is required (see FFNZ's submission on Variation 1).</p>
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9365	Schedule C	<p>AMEND Schedule C to read: "Water bodies from which cattle...</p> <p>i. Any river that <u>is continually contains surface water</u> flowing (i.e. that is not</p>	Support in part	FFNZ considers that the exclusion ought to apply to accord water bodies. In the even that that is not successful, FFNZ would support alternatives to narrow the water bodies this applies to like requiring

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>identified as an intermittently flowing river).</u></p> <p>ii. Any drain <u>(including farm drain canal)</u> that continually contains surface water.</p> <p>iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u>"</p>	Oppose in part	the water to be flowing and not intermittent, and the qualifications for wetland.
Matamata-Piako District Council Submitter ID: 73419	PC1-3687	Schedule C	AMEND to provide evidence that the section 32 evaluation confirms Schedule C is the preferred approach to adopt and work with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes. AND DELETE Schedule C(2).	Support in part	<p>FFNZ supports a robust section 32 assessment and is concerned that Schedule C will impose significant cost for no net benefit (see FFNZ's FEP study and submission on Variation 1 and PC1).</p> <p>FFNZ agrees that paragraph 2 ought to be deleted but that further amendments are needed as set out in its submission on Variation 1.</p>
Miraka Limited Submitter ID: 73492	PC1-8897	Schedule C	AMEND Schedule C(4) to ensure a single date for all exclusion irrespective of sub-catchment.	Oppose	FFNZ supports staged implementation and more time particularly as stock exclusion is likely to involve significant cost.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11866	Schedule C	DELETE Schedule C AND REPLACE with cross references to the proposed national stock exclusion regulations AND MAKE consequential amendments.	Support in part	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ is concerned that there are no national stock exclusion requirements and the draft regulations had several issues including the practicality and</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>uncertainty around determining slope. FFNZ prefers an approach that is not based on slope but instead based on stock units or a narrative approach (see FFNZ's submission on Variation 1).</p> <p>In the event that it is not amended as set out in FFNZ's submission on Variation 1 it would support the deletion of the schedule.</p>
<p>Ngati Haua Tribal Trust Submitter ID: 73025</p>	<p>PC1-1978</p>	<p>Schedule C</p>	<p>AMEND Schedule C to address the implications of stock exclusion on steeper and more extensive hill country. AND AMEND by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority. AND AMEND to consider alternative solutions on steep land such as water reticulation installation. AND AMEND to match land use capability rather than directly to slope.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ would support a narrative approach in the event its proposal is not successful like linking exclusion to intensity and providing a solution for hill country. FFNZ also supports alternatives such as water reticulation for steep land.</p> <p>FFNZ does not agree with the proposal to link to land capability. While FFNZ is concerned that basing stock exclusion on slope would have several issues including the practicality and uncertainty around determining slope, FFNZ prefers an approach based on stock units or a narrative description of when stock exclusion is required (see FFNZ's submission on Variation 1) as opposed to LUC for reasons including that LUC is a poor proxy</p>

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					and may result in an allocation approach (which FFNZ opposes).
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8803	Schedule C	<p>AMEND Schedule C to refer to livestock (not including sheep) AND AMEND to reflect the alternative approach proposed in the submission including: REMOVE from Schedule C reference to Farm Environment Plans AND AMEND Schedule C clauses 4(a) and 5 so that the date of 2020 applies to all properties and enterprises AND AMEND the provisions to ensure that stock exclusion represents the Best Practicable Options for specific land uses and associated activities AND DELETE Schedule C clause 4 (b). AND DELETE Clause 2 and replace with: "Where the property or enterprise contains any of the water bodies listed in Schedule C i. There shall be no cultivation within 5 metres of the bed of the water body; and ii. New fences installed after 22 October 2016 must be located to ensure livestock (not including sheep) cannot be within three metres of the bed of the water body (excluding constructed wetlands and drains); OR apply a stock exclusion buffer the is appropriate to the size and location of the water body eg 10m for rivers, lakes and wetlands and 20m for</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that Schedule C should not include sheep.</p> <p>FFNZ does not support the alternative approach proposed by this submitter and therefore opposes amendments to reflect it.</p> <p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

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			regionally significant water bodies plus 0.62 times the LUC average.		
Pamu Farms of New Zealand Submitter ID: 74000	PC1-5821	Schedule C	<p>AMEND Schedule C so that it applies to ephemeral streams and wet seepages from 2026.</p> <p>AND AMEND so that in 2024 council and industry undertake a section 32 analysis of Schedule C and publish this for Catchment Community comment by 2025.</p> <p>AND AMEND to specify design storm water flow capture and treatment criteria for crossings and adjacent track surface area. Suggest detention and treatment is required for 10 percent AEP 48 hour event, or as determined by a decision support tool in consultation with affected parties.</p> <p>AND AMEND to determine the minimum setback for riparian fencing with regards to published literature, slope, Land Use Class, particular soils and optimised for the contaminants of concern. A table of requirements should be appended, over that of a single stated distance. TP350 standards could be stated.</p>	Oppose in part	<p>FFNZ considers that Schedule C is too onerous and will result in significant cost for no net benefit. Therefore it does not support proposals to make it more stringent e.g. applying it to ephemeral streams and wet seepages and the other proposals in this submission point that would have that effect.</p> <p>FFNZ does not agree with the proposal to link stock exclusion with land capability. While FFNZ is concerned that basing stock exclusion on slope would have several issues including the practicality and uncertainty around determining slope, FFNZ prefers an approach based on stock units or a narrative description of when stock exclusion is required (see FFNZ's submission on Variation 1) as opposed to LUC for reasons including that LUC is a poor proxy and may result in an allocation approach (which FFNZ opposes).</p> <p>FFNZ opposes a table of requirements because that would akin to input controls, would not provide for sufficient tailoring and would likely impose significant cost for no net benefit.</p>
Primary Land Users Group Submitter ID: 71427	PC1-11181	Schedule C	<p>AMEND Schedule C to read: "...2. New fences installed after 22 October 2026 must be located to ensure cattle, horses, deer and pigs cannot be within one metre of theenter the bed of the water body (excluding constructed wetlands) <u>in accordance with Schedule 1.</u></p>	Support in part	<p>FFNZ agrees that stock ought to be excluded from the bed of a water body not 1m and as provided for in a FEP.</p> <p>FFNZ agrees that reasonable stock crossing ought to be provided for without requiring expensive and impractical stock crossing structures. FFNZ agrees with the proposal for stock to be allowed to cross</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>3. Livestock must not be permitted to enter onto or pass across the bed of the water body, except when using a livestock crossing structure or <u>where stock is moved in one continuous movement and this occurs less frequently than once per week</u></p> <p>...</p> <p>5. For land use authorised under Rules 3.11.5.3, 3.11.5.4 or 3.11.5.5, clauses 1 and 2 must be complied with:...</p> <p>...Water bodies from which cattle, horses, deer and pigs must be excluded:</p> <p>i. Any river that continually contains surface water and <u>exceeds 1m wide at any point and is 30cm deep on average.</u></p> <p>ii. Any drain that continually contains surface water <u>exceeds 1m wide at any point and is 30cm deep on average.</u></p> <p>...</p> <p>Exclusions: The following situations are excluded from clauses 1 and 2:</p> <p>I. <u>Areas with slopes exceeding 15 degrees and where no break feeding occurs.</u></p> <p>II. Where the entry onto or passing across the bed of the water body is by horses that being ridden or led.</p> <p>III. Where the entry onto or passing across the bed of the water body is by a feral animal.</p> <p>IV. <u>Areas less than 15 degrees</u></p>		<p>water if they are being actively managed and it is not more than once a week.</p> <p>FFNZ agrees that stock exclusion ought to apply to accord water bodies.</p> <p>FFNZ is concerned that the proposal to base stock exclusion on slope has several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach based on stock units or a narrative description of when stock exclusion is required (see FFNZ's submission on Variation 1).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>demonstrated to be in high flood zones and where fencing is impractical.</u>		
Raukawa Charitable Trust Submitter ID: 74073	PC1-10589	Schedule C	AMEND Schedule C to read: "Water bodies from which cattle... i. Any river that <u>is continually contains surface water</u> flowing (i.e. that is not identified as an intermittently flowing river). ii. Any drain (including farm drain canal) that continually contains surface water. iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u> "	Support in part Oppose in part	FFNZ considers that the exclusion ought to apply to accord water bodies. In the even that that is not successful, FFNZ would support alternatives to narrow the water bodies this applies to like requiring the water to be flowing and not intermittent, and the qualifications for wetland.
Rotorua Lakes Council Submitter ID: 73373	PC1-2534	Schedule C	AMEND Schedule C, the Stock Exclusion provision to: Provide flexibility and exceptions where the cost significantly outweighs the benefits. CLARIFY that the stock exclusion provision in an approved Farm Environment Plan will override Schedule C. Rationalise the setback for fences so they are the same for Schedule C and all rules. AND MAKE any consequential amendments.	Support in part	FFNZ agrees that flexibility ought to be provided for and the cost ought to e taken into account. FFNZ also agrees that stock exclusion provisions in a FEP ought to be able to override Schedule C. FFNZ agrees that the setbacks ought to be rationalised and considers this should be on the basis FFNZ proposes in its submission on Variation 1.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11195	Schedule C	AMEND to clarify the relationship/interpretation of the stock exclusion requirements between Schedule C and Schedule 1 Farm Environment Plans.	Support in part	FFNZ agrees that the relationship between Schedule C and FEPs ought to be clarified and that stock exclusion provisions in a FEP ought to be able to override Schedule C.

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South Waikato District Council Submitter ID: 72892	PC1-4169	Schedule C	Provide evidence that the section 32 evaluation confirms efficiency and effectiveness of this Schedule C. Work with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes. AND DELETE Schedule C clause 2.	Support	FFNZ agrees that Schedule C ought to be based on a robust section 32 assessment, reasonable, practical and affordable and landowners etc need to be involved. FFNZ agrees to the deletion of paragraph 2.
Stark, Steven and Theresa Submitter ID: 73721	PC1-5223	Schedule C	AMEND Schedule C by using the minimum standards for stock exclusion as set out in Ministry for the Environment's Clean Water document published February 2017, publication number ME 1293.	Support in part Oppose in part	FFNZ is concerned that there are no national stock exclusion requirements and the draft regulations had several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach that is not based on slope but instead based on stock units or a narrative approach (see FFNZ's submission on Variation 1). FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11816	Schedule C	AMEND Schedule C to read: "Water bodies from which cattle... i. Any river that is continually contains surface water flowing (i.e. that is not identified as an intermittently flowing river).	Support in part Oppose in part	FFNZ considers that the exclusion ought to apply to accord water bodies. In the even that that is not successful, FFNZ would support alternatives to narrow the water bodies this applies to like requiring the water to be flowing and not intermittent, and the qualifications for wetland.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>ii. Any drain (<u>including farm drain canal</u>) that continually contains surface water.</p> <p>iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u>"</p>		
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8453	Schedule C	RETAIN Schedule C.	Support in part Oppose in part	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. However, FFNZ considers that Schedule C requires substantial amendment.</p> <p>FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>
Tongariro Taupo Conservation Board Submitter ID: 74060	PC1-4869	Schedule C	RETAIN Schedule C stock exclusion from water bodies, setbacks and riparian planting.	Support in part Oppose in part	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. However, FFNZ considers that Schedule C requires substantial amendment.</p> <p>FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Trustees of Highfield Deer Park Submitter ID: 73932	PC1-4037	Schedule C	AMEND Schedule C by providing a definition for 'stream bed'. AND AMEND by allowing an extension of the deadline where financial hardship prevents compliance.	Support in part	FFNZ agrees that a reasonable definition of stream bed ought to be provided that ought to be based on accord water bodies and ought to be reasonable, practical and affordable (see FFNZ's submission on Variation 1). FFNZ also agrees that extension of deadline ought to be provided particularly as the stock exclusion requirements are likely to impose significant cost.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10569	Schedule C	AMEND Schedule C to read: "Water bodies from which cattle... i. Any river that is continually contains surface water <u>flowing (i.e. that is not identified as an intermittently flowing river)</u> . ii. Any drain <u>(including farm drain canal)</u> that continually contains surface water. iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u> "	Support in part Oppose in part	FFNZ considers that the exclusion ought to apply to accord water bodies. In the even that that is not successful, FFNZ would support alternatives to narrow the water bodies this applies to like requiring the water to be flowing and not intermittent, and the qualifications for wetland.
Waikato and Waipa Branches of the New Zealand Deer Farmers Association Submitter ID: 74008	PC1-9582	Schedule C	DELETE Schedule C.	Support in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					In the event that it is not amended as set out in FFNZ's submission on Variation 1 it would support the deletion of the schedule.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3542	Schedule C	AMEND Schedule C to read: "Water bodies from which cattle... i. Any river that is continually contains surface water flowing (i.e. that is not identified as an intermittently flowing river). ii. Any drain (including farm drain canal) that continually contains surface water. iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u> "	Support in part Oppose in part	FFNZ considers that the exclusion ought to apply to accord water bodies. In the even that that is not successful, FFNZ would support alternatives to narrow the water bodies this applies to like requiring the water to be flowing and not intermittent, and the qualifications for wetland.
Waikato District Council (WDC) Submitter ID: 73418	PC1-3116	Schedule C	AMEND Schedule C, with the following, or similarly intended wording. Exclusions: The following situations are excluded from clauses 1 and 2 <u>"(III) where the stocking rate is low (less than 18 SU per ha) and: -the costs of exclusion are high, and; -other mitigation actions are taken, as approved by a Certified Farm Environment Planner"</u>	Support	FFNZ agrees that the stock exclusion requirements should not apply to below 18 stock units or where the costs are high or where other mitigations are proposed in an FEP (see FFNZ's submission on Variation 1).
Waikato Environment Centre Submitter ID: 73436	PC1-6240	Schedule C	AMEND Schedule C to reduce the timeframes for stock to be excluded from water ways.	Oppose	Schedule C is going to put significant cost on farmers and the timeframes are too short. Therefore FFNZ does not support making them shorter.
Waikato Regional Council	PC1-3571	Schedule C	AMEND Schedule C to ensure that it is not inconsistent with the national regulations and to ensure that	Support in part	FFNZ is concerned that there are no national stock exclusion requirements and the draft regulations had several issues including the practicality and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 72890			<p>together they provide for the most efficient and effective approach to stock exclusion.</p> <p>AND ADD at the end of Schedule C an advisory note to read: "<u>A reference to a river includes a reference to a stream.</u>"</p> <p>AND AMEND Schedule C to ensure consistency with Schedule 1 stock exclusion requirements.</p> <p>AND AMEND Schedule C: Exclusions to read: "The following situations are excluded from clauses 1 and 2 clause 3."</p> <p>AND AMEND Schedule C clause 5 to read: "For land use authorised... Farm Environment Plan, <u>prepared in accordance with Schedule 1, which shall be within 3 years...</u>"</p>	Oppose in part	<p>uncertainty around determining slope. FFNZ prefers an approach that is not based on slope but instead based on stock units or a narrative approach (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ opposes proposals to make stock exclusion more stringent e.g. reference to river and stream.</p>
Waipa District Council Submitter ID: 67704	PC1-3234	Schedule C	<p>DELETE Schedule C and replace it with cross references to the proposed national stock exclusion regulations being produced by the Ministry for the Environment and make any necessary consequential amendments to the rules.</p>	Support in part	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ is concerned that there are no national stock exclusion requirements and the draft regulations had several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach that is not based on slope but</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>instead based on stock units or a narrative approach (see FFNZ's submission on Variation 1).</p> <p>In the event that it is not amended as set out in FFNZ's submission on Variation 1 it would support the deletion of the schedule.</p>
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11388	Schedule C	RETAIN Schedule C as notified or amended by similar wording to like effect.	Support in part Oppose in part	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. However, FFNZ considers that Schedule C requires substantial amendment.</p> <p>FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2147	Schedule C	RETAIN Schedule C.	Support in part Oppose in part	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. However, FFNZ considers that Schedule C requires substantial amendment.</p> <p>FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p>

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Waitomo Catchment Trust Board Submitter ID: 73124	PC1-7949	Schedule C	AMEND Schedule C to prioritise stock exclusion from the waterways, wetlands and lakes known to Waikato Regional Council, in a staged manner focussing on the larger and/or most polluted waterways first. AND CLARIFY further the definition of waterways. AND AMEND to provide funding and subsidies for all new riparian and erosion prone fencing, maintenance and alternative water systems.	Support in part Oppose in part	<p>IN principle, FFNZ supports a staged and prioritised approach. However, FFNZ considers that Schedule C is too stringent and will impose significant cost. Therefore it opposes this submission point to the extent that it will make it even more stringent.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ supports the provision of public funding for fencing and riparian planting etc.</p>
Waitomo District Council Submitter ID: 73688	PC1-10846	Schedule C	DELETE Schedule C AND REPLACE it with cross references to the proposed national stock exclusion regulations being produced by the Ministry for the Environment AND MAKE any necessary consequential amendments to the rules.	Support in part	<p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ is concerned that there are no national stock exclusion requirements and the draft regulations had several issues including the practicality and uncertainty around determining slope. FFNZ</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>prefers an approach that is not based on slope but instead based on stock units or a narrative approach (see FFNZ's submission on Variation 1).</p> <p>In the event that it is not amended as set out in FFNZ's submission on Variation 1 it would support the deletion of the schedule.</p>
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-9595	Schedule 1	AMEND Schedule 1 paragraph 2 to add the words " <u>where required</u> " after the word 'reduce'.	Support in part	FFNZ agrees that contaminants should only have to reduce where required and there should be no presumption that all contaminants must reduce everywhere. FFNZ's preference is that this paragraph is deleted (refer to its submission on Variation 1).
Advisory Committee on Regional Environment (ACRE) Submitter ID: 72441	PC1-12333	Schedule 1	AMEND Schedule 1 (5)(a) by adding at the beginning of the clause " <u>With the exception of low level discharges</u> " or " <u>a percentile level not greater than any other levels requiring reductions.</u> " AND AMEND Schedule 1(5)(b) to refer to the 50th percentile in place of the 75th percentile in lines 1 and 2.	Support in part Oppose in part	<p>FFNZ would agree with the proposed changes if they provided greater flexibility for low intensity activities and placed no more stringent obligations on other farming activities.</p> <p>FFNZ does not support changing the reference to the 50th percentile for reasons including that his will likely impose significant cost for no net benefit.</p>
Auckland Council Submitter ID: 73518	PC1-9142	Schedule 1	AMEND Schedule 1 to provide for clarification on Farm Environment Plan structures for properties which overlap a shared local government (regional council) boundary.	Support in part	FFNZ agrees that clarity is required and considers that FEPs should not apply to properties (or parts of properties) outside WRC boundaries unless affected parties have had an opportunity to participate in a Schedule 1 process.
Auckland Regional Public Health Service Submitter ID: 71612	PC1-10180	Schedule 1	RETAIN Schedule 1.	Support in part Oppose in part	In principle, FFNZ agrees with FEPs but it considers that significant amendments are needed to Schedule 1 as set out in its submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Bailey, James Submitter ID: 73926	PC1-9025	Schedule 1	AMEND PPC1 to recognise Land Use Suitability and Natural Capital as the basis of nitrogen management AND DELETE the Schedule 1 requirement to manage property level discharges to a Nitrogen Reference Point based on historic profiles AND AMEND to provide a flexibility cap for low leaching farm systems below a certain threshold (20kg/N/ha/yr) that is deemed as a sustainable level for the transition period, with farmers with a Nitrogen Reference Point below this enabled to increase up to this point.	Support in part Oppose in part	FFNZ does not support the proposal to base land management on LUS and/or natural capital. FFNZ also considers that there is no reliable proxy for natural capital and that it is not appropriate to allocate or manage land on this basis. FFNZ supports the NRP as long as it is used as a reference point and amendments are made to allow flexibility to increase nitrogen (see FFNZ's submission Variation 1). FFNZ agrees that flexibility ought to be provided for low nitrogen emitters to increase and would support 20kgN if it was supported by a robust section 32 assessment.
Bailey, James Submitter ID: 73926	PC1-12356	Schedule 1	AMEND Schedule 1 to replace the 'staged' approach with an 'Adaptive Management' approach to managing nitrogen and all contaminants AND AMEND to enable transition toward the Vision and Strategy with Land Use Suitability as a starting point and using Adaptive Management as our understanding develops, reviewing and adapting through subsequent plan changes. AND AMEND PPC1 to apply Land Use Suitability and Natural Capital now by including allocation based on the Natural Capital of soils through a Land Use Capability approach.	Support in part Oppose in part	In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available. FFNZ considers that LUS and natural capital are not sufficiently developed to provide a basis for nitrogen management. FFNZ does not support allocation of nitrogen or LUC as a basis for allocation. FFNZ considers there ought to be a transition to achieving the Vision & Strategy and that achieving the Vision & Strategy does not require the adoption of 80 year targets in this plan change. FFNZ also considers there should not be a transition to LUS as a starting point or adaptive management for reasons set out above.
Ballance Agri-Nutrients Limited	PC1-7105	Schedule 1	AMEND Schedule 1(A)(2)(b)(iii) to read: "The provision of minimum cultivation setbacks of 5 metres,	Support in part	FFNZ considers that the cultivation set backs are too stringent and considers they ought to be amended as set out in its submission on Variation 1.

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Submitter ID: 74036			<p><u>except where the property is managed in accordance with Good Management Practices that accord with the practices described in the document entitled 'Industry-agreed Good Management Practices relating to water quality' - dated September 2015".</u> AND AMEND (A)(2)(f)(d) to read: "maintaining appropriate buffers between cultivated areas and water bodies (minimum 5m setback), <u>except where the property is managed in accordance with Good Management Practices that accord with the practices described in the document entitled 'Industry-agreed Good Management Practices relating to water quality' - dated September 2015"</u> AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	Oppose in part	<p>In the even that proposal is not successful, FFNZ would support a proposal that meant they were less stringent than as notified such as that proposed by this submitter.</p> <p>In principle, FFNZ supports the adoption of industry agreed GMP. However, FFNZ considers that this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs. FFNZ's concerns include that adopting GMP would be inflexible, would likely impose significant cost and might result in rigid and untailed input controls (see FFNZ's submission on Variation 1).</p>
Balle Bros Group Submitter ID: 67834	PC1-11435	Schedule 1	<p>AMEND Schedule 1 to read: "...2. An assessment of the risk of diffuse discharge... (a) A description of where and how stock shall be excluded from water bodies for stock exclusion including: ... (ii) For areas with a slop exceeding 25<u>15</u> degrees and where stream fencing is impracticable, the provision for alternative mitigation measure.</p>	Support in part Oppose in part	<p>FFNZ is concerned that the proposal to base fencing on slope has several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach based on stock units or a narrative description of when stock exclusion is required (see FFNZ's submission on Variation 1).</p> <p>However, in the event that FFNZ's appeal point is not successful it would support any proposal to make this less stringent such as 15 degree slope</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>(b) A description of setbacks and riparian management, including: ... (ii) Where practicable the provisions for minimum grazing setbacks from the water bodies for stock exclusion of 1 metre for land with a slope of less than 15 degrees and 3 metres for land between 15 degrees and 25 degrees <u>where break feeding occurs</u>; and (iii) The provisions of minimum cultivation setbacks of 5 metres <u>unless diffuse discharges can be mitigated</u>.</p> <p>(c) A description of the critical source areas from which sediment, nitrogen, phosphorus and microbial pathogens are lost, including: ... (f) A description of cultivation management, including: (i) The identification of slopes over 15 degrees and how cultivation on them will be avoided; unless contaminant discharges to water bodies from that cultivation can be avoided <u>mitigated</u>; and ... 3. A spatial risk map(s) at a scale that clearly shows: ... (e). The location of continually flowing rivers, streams and drains <u>that exceed 1m wide and 30cm deep on average</u> and permanent lakes, ponds</p>		<p>and excluding break feeding as proposed by the submitter.</p> <p>FFNZ agrees that the focus ought to be on mitigating and not avoiding.</p> <p>FFNZ agrees with the amendments in paragraph 3(e) which are similar to accord water bodies (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees with the proposed deletion of references to the 75th percentile.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>and wetlands; and</p> <p>...</p> <p>(5). A description of the following:</p> <p>(a) Actions, timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by the five year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; or</p> <p>(b) where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching values, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, except in the case of Rule 3.11.5.5..."</p>		
<p>Beef + Lamb New Zealand Limited Submitter ID: 73369</p>	<p>PC1-11508</p>	<p>Schedule 1</p>	<p>AMEND Schedule 1 so farmers can identify the specific actions they will need to take through their Farm Environment Plan to address any water quality issues relevant within their sub-catchment. The Council must identify relevant water quality issues within the sub-catchment, as well as the associated mitigations that farmers should consider. This information must be provided to</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that the FEP ought to specify specific actions to address any water quality issues in their sub-catchment. However, FFNZ considers that their actions need to be tailored and proportionate and take into account the resources reasonably available to the farm enterprise. For that reason proposes that FEPs are guided by MPA (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that Council ought to identify the relevant water quality issues and provide that information before farmers do a FEP. FFNZ</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			farmers before they are required to develop a Farm Environment Plan. AND DELETE requirement to be certified by a Certified Farm Environment Planner AND REPLACE with industry approved standard or developed in accordance with skills required to support the development of a Council approved Farm Environment Plan. AND AMEND to enable application of 'Best Practicable Option'.		<p>considers that this is best addressed through the Catchment Profiles FFNZ proposes in its submission on Variation 1.</p> <p>FFNZ does not agree with the proposal to remove the requirement for a certified farm environment planner on the basis that FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.</p> <p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.</p>
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-12364	Schedule 1	AMEND Schedule 1 (2) (ii) as follows: "for areas with a slope exceeding 25 15 degrees and where stream fencing is impracticable, the provision of alternative mitigation measures." AND DELETE Schedule 1 (f) (i). AND AMEND Schedule 1 (f) (ii) to apply irrespective of slope.	Support in part Oppose in part	<p>FFNZ considers that paragraph 2(ii) ought to be deleted (see its submission on Variation 1). However, in the event that proposal is not successful, FFNZ would support changing the paragraph to provide for more options in terms of mitigation measures for a larger range of slopes.</p> <p>FFNZ agrees that paragraph f(i) ought to be deleted (see FFNZ's submission on Variation 1).</p>
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-12365	Schedule 1	AMEND Schedule 1 (5) (a) to enable flexibility in Nitrogen discharges up to the sustainable Nitrogen discharge level, but where this is exceeded Nitrogen discharges shall not exceed the Nitrogen Reference Point.	Oppose in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ considers that there ought to be flexibility for all nitrogen discharges to increase (in appropriate circumstances) and not just low discharges up to a "sustainable" level (see FFNZ's

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			<p>AND AMEND Schedule 1 (5) (b) so that where the Nitrogen Reference Point exceeds the sustainable Nitrogen discharge level, actions, timeframes and other measures are set out and implemented to ensure that Nitrogen discharge is reduced overtime in a manner and to the extent that corresponds with the level of water quality improvement required to achieve the water quality outcomes and which is proportionate to the level of discharge, i.e. those discharging the most will be required to reduce the most (15 percent of total discharge each 10 year period) AND AMEND Schedule 1 to ensure that land use activities are not able to increase Nitrogen discharge beyond either their Nitrogen Reference Point or the sustainable leaching level, whichever is the highest - default to non-complying Rule.</p>		<p>submission on Variation 1). FFNZ also has concerns about how the “sustainable level” is calculated (FFNZ does not support the 80 year targets) and that this may result in or be used to justify an allocation approach.</p> <p>FFNZ has concerns that any requirement to reduce discharges where the “sustainable level” is exceeded will place significant cost on farmers for no net benefit and will be flawed (for reasons including that the 80 year targets are based on flawed assumptions and FFNZ considers that in may sub-catchments nitrogen is likely to be the least of the issues, see FFNZ’s submission on Variation 1).</p> <p>FFNZ does not support an arbitrary requirement to reduce by 15% in the 10 year period. This is for reasons including that FFNZ considers this a blunt and untailed instrument, it will likely result in significant cost for no net benefit and it is effectively an allocation approach.</p> <p>FFNZ does not support the proposal that those who exceed their NRP should be non complying for reasons including that FFNZ considers a reasonable consenting pathway ought to be provided, flexibility ought to be provided for nitrogen increase in appropriate circumstances (and especially when nitrogen is the least of the issues and significant progress is proposed on other contaminants but there is a need to increase nitrogen to achieve that) and for other reasons set out in FFNZ’s submission on Variation 1.</p>
Beef + Lamb New Zealand Limited	PC1-12366	Schedule 1	RETAIN Schedule 1 (d)	Oppose in part	FFNZ considers that Schedule 1(d) ought to be deleted. FFNZ does not support an approach of

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73369			AND AMEND Schedule 1 (2) (c) to refer to key critical source areas only.		<p>matching land use to land capability for reasons including that LUC may have merit as a decision support tool but it is not a reasonable proxy for nitrogen or other contaminants, using it in this way is likely to impose significant cost for no net benefit and is likely to be used to justify or inform an allocation approach.</p> <p>In principle, FFNZ supports the critical source area assessment approach in paragraph 2(c) but considers that it requires significant amendment including to guide assessment of mitigations with MPA and to be clear that the suggested mitigations are only examples (see FFNZ's submission on Variation 1).</p>
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-12367	Schedule 1	AMEND Schedule 1 (3) to include spatial mapping requirements from clauses 2 (c) (i), 2 (c) (ii), 2 (c) (iv), 2 (c) (v), 2 (d) (ii), 2 (d) (iv) and 2 (f) (i).	Oppose in part	FFNZ does not agree with an LUS or LUC approach or a requirement to match land with "capability" or with a requirement to "avoid" cultivation on slopes above 15 degrees. Therefore, FFNZ does not support the proposal to require maps to identify these areas. FFNZ considers that maps may be a helpful tool but there ought to be flexibility for the individual farmer and CFEP to decide whether they are used and if they are there should be clear limitations or parameters around their use e.g. they should not be used for compliance or to support an allocation approach.
Bolt Trust, King Country Partnership 2013 LP and Lone Pine Trust Submitter ID: 73539	PC1-12375	Schedule 1	AMEND to ensure PPC1 takes into account the worlds reliance on the agricultural sector in the Waikato Region AND AMEND PPC1 so farmers who have already taken action are recognised and not penalised	Support in part Oppose in part	<p>FFNZ agrees that the significance and importance of the agricultural sector ought to be taken into account and the social, economic and cultural costs/impacts need to be appropriately assessed and addressed.</p> <p>FFNZ agrees that PC1 ought to recognise previous practices and mitigations, including those that have</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND PPC1 so different farming systems are types of farming are treated differently AND AMEND to ensure PPC1 does not use a blanket approach.</p>		<p>resulted in lower nitrogen discharges and therefore a low NRP.</p> <p>FFNZ supports an approach that is consistent across all sector but acknowledges that this does not mean that the same approach ought to be adopted and that differences will need to be taken e.g. FFNZ's proposed discharge Rule 5A to provide for crop rotation, flexibility for low nitrogen discharges to increase as a permitted activity etc (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that PC1 should not adopt a blanket approach and needs to be tailored, proportionate and taken into account the resources reasonably available to the farm enterprise (see FFNZ's submission on Variation 1).</p>
<p>Bolt Trust, King Country Partnership 2013 LP and Lone Pine Trust Submitter ID: 73539</p>	<p>PC1-6472</p>	<p>Schedule 1</p>	<p>AMEND Schedule 1 to ensure all present grazing land is allowed to continue to be grazed using current stock classes AND AMEND Schedule 1 to ensure cropping is able to continue on land greater than 15 degrees and winter crops are able to be grazed directly by livestock AND AMEND PPC1 so grass buffers continue to be used, even increased, around crop areas, to control nutrient and sediment runoff AND AMEND Schedule 1 to relate cultivation requirements directly and initially to farms near waterbodies, ensuring these are prioritised with regards to mitigation actions</p>	<p>Support in part Oppose in part</p>	<p>FFNZ agrees that present grazed land should continue but does not support the proposal to use current stock classes if that means a LUC type approach.</p> <p>FFNZ agrees that arable cropping should be able to be continued on land above 15 degrees and that winter crops should be able to be grazed directly. FFNZ considers that these areas ought to be considered through the critical source area and MPA assessment (see FFNZ's submission on Variation 1) without a blanket rule restricting these activities.</p> <p>FFNZ does not agree that amendments should be made about grass buffers because it considers that there needs to be flexibility to consider this through tailored FEPs (see FFNZ's submission on Variation 1).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to provide a clearer definition of slope in PPC1.		<p>FFNZ supports a prioritised approach but considers that cultivation requirements ought to be considered in FEPs and PC1 should not contain specific requirements for mitigation action (see FFNZ's submission on Variation 1).</p> <p>FFNZ is concerned that approaching setbacks and stock exclusion on the basis of slope has several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach based on stock units or a narrative description of when stock exclusion is required or something similar when assessing other restrictions based on slope (see FFNZ's submission on Variation 1).</p>
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10807	Schedule 1	AMEND Schedule 1 to read: "A. Farm Environment Plans shall contain as a minimum: (e) A description of nutrient management practices including: i. a nutrient budget for the farm enterprise calculated using the model OVERSEER® in accordance with the OVERSEER® use protocols, or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council; <u>and</u> ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences</u> "	Oppose in part	<p>FFNZ considers that flexibility needs to be provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and that Overseer should not be used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ is concerned that this proposal will result in a more stringent and less flexible approach and therefore does not agree with it. FFNZ is also concerned that the requirement for an "opinion on material differences" is ambiguous, has the potential to create disputes and would likely impose significant cost.</p>
DairyNZ Submitter ID: 74050	PC1-10255	Schedule 1	AMEND Schedule 1 paragraph 2 to read: "The Farm Environment Plan shall identify all <u>critical source areas</u>	Oppose in part	In principle FFNZ supports the clarification that the FEP is to identify critical source areas not just "source areas." However FFNZ considers that this paragraph ought to be deleted and a new section

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>sources of sediment, nitrogen, phosphorus..."</p> <p>AND AMEND Schedule 2 (b. iii) by altering the provision to focus on managing critical source areas.</p> <p>AND AMEND to ensure that a 5m cultivation setback from water bodies in low risk areas is not necessary if critical source areas have been identified and mitigations put in place.</p>		<p>inserted which sets out the purpose of an FEP as proposed in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that paragraph 2(b)(iii) ought to be deleted (all of paragraph 2 is deleted in FFNZ's submission on Variation 1) and minimum standards addressed in Schedule C and a critical source area assessment for more tailored mitigations (see FFNZ's submission on Variation 1). IN the event that this is not successful, FFNZ would support the proposal to re-focus paragraph 2(b)(iii) on critical source areas.</p> <p>FFNZ considers that 5m is too high as a minimum standard and ought to be 1m with a critical source area assessment and MPA assessment potentially leading to a higher setback if appropriate (see FFNZ's submission on Variation 1). In the event that this is not successful, FFNZ would support the proposal to ensure a 5m setback is not necessary in the circumstances suggested in the submission point.</p>
DairyNZ Submitter ID: 74050	PC1-12391	Schedule 1	Schedule 1 - CLARIFY that the Farm Environment Plan allows alternative mitigations where it can be shown that these alternative mitigations achieve at least the same reduction of contaminants entering the water bodies as any standard provided for in PPC1.	Support	FFNZ considers that Schedule 1 should clearly state that the suggested options or mitigations are examples and not the only ones that can be considered.
Department of Conservation Submitter ID: 71759	PC1-10647	Schedule 1	<p>AMEND Schedule 1 to more clearly define the goals for a Farm Environment Plan.</p> <p>AND AMEND Schedule 1 to require Farm Environment Plans to identify critical nitrogen and phosphorous</p>	Oppose in part	FFNZ considers that there ought to be a new section inserted about the purpose of a FEP as proposed in FFNZ's submission on Variation 1. But it does not support the proposal to be any more specific about goals.

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			<p>sources for lakes, and to identify on-farm methods to reduce nitrogen, phosphorus and sediment discharges to lakes.</p> <p>AND AMEND Schedule 1 so that Farm Environment Plans identify where existing drains can be restored or intercepted to reduce nutrient and sediment inputs into lakes.</p>		<p>FFNZ does not support the requirement for FEPs to identify N and P sources for lakes. As explained in FFNZ's submission FFNZ supports tailored and proportionate FEPs that focus on the critical source areas on farm using the MPA framework and supports the sub-catchment management plan method for lakes.</p> <p>FFNZ does not support a blanket requirement like the one proposed for drains and considers this ought to be addressed through assessing the critical source areas on farm using the MPA framework (see FFNZ's submission on Variation 1).</p>
<p>Department of Conservation Submitter ID: 71759</p>	<p>PC1-12393</p>	<p>Schedule 1</p>	<p>AND AMEND Schedule 1(2)(b)(iii) to require 10m fencing setbacks for cultivation from permanent rivers, lakes and outstanding waterbodies and 5m cultivation setbacks from intermittent rivers and wetlands. For peat lakes, a 20m setback for cultivation should be implemented.</p> <p>AND AMEND Schedule 1 to require that setbacks for grazing and cultivation on sloping land be evaluated in relation to soil type to ensure an appropriate setback distance is achieved (the Horizons Regional Council guideline is suggested as a useful start). A 20m setback for sloping land of 20 degrees or more could be appropriate.</p>	<p>Oppose</p>	<p>FFNZ considers that paragraph b ought to be deleted. FFNZ considers that reasonable, practical and affordable minimum standards ought to be provided for in Schedule C and then FEPs ought to consider tailored and proportionate actions by assessing critical source areas and using the MPA framework (see FFNZ's submission on Variation 1). Therefore, FFNZ does not support making setbacks more stringent and opposes the proposal for 10m, 5m and 20m setbacks.</p> <p>FFNZ does not support an approach that links grazing with soil type for reasons including that this is not a reliable proxy for contaminant discharges, is likely to result in significant cost for no net benefit and is likely to be used to justify or implement an allocation approach.</p> <p>FFNZ does not support a 20m setback for land of 20 degrees slope for reasons including that this is arbitrary, impractical, difficult to assess and likely to result in significant cost for no net benefit.</p>

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Department of Conservation Submitter ID: 71759	PC1-12394	Schedule 1	AMEND Schedule 1 to provide that Farm Environment Plans recognise the potential role for wetlands to assist in the management of water quality and to recognise their significant values by (a) ensuring all wetlands, permanent and ephemeral are identified in Farm Environment Plans; (b) that the management of nutrients and sediment ensures that adverse effects on wetland systems and their values are avoided or mitigated; and (c) existing drainage of wetlands is stopped and any future drainage of wetlands is avoided.	Oppose	FFNZ considers that it would be unreasonably onerous, impractical and impose significant cost for no net benefit if there was a requirement to identify all wetlands, manage effects of nutrients on these wetlands and to avoid draining of wetlands.
Farm Environment Trust (Waikato) Submitter ID: 73798	PC1-5056	Schedule 1	AMEND Schedule 1.A.5 to consider the limitations of the OVERSEER Model when setting fixed Reference Points in catchments where nitrogen is not the issue. AND AMEND so that as science develops new understandings about nutrient management then this needs to be included in PPC1 even if it requires a new nutrient model program to replace Overseer.	Support	FFNZ agrees that there ought to be flexibility in the use of Overseer and recognition of its limitations and provision for alternative models or recognition of mitigations outside of Overseer or alternative input standards. FFNZ agrees that provision needs to be made for new science and it needs to be enabled.
Farmers 4 Positive Change (F4PC) Submitter ID: 73355	PC1-10429	Schedule 1	REMOVE the Schedule 1 Nitrogen Reference Point.	Oppose in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).

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Farmers 4 Positive Change (F4PC) Submitter ID: 73355	PC1-12400	Schedule 1	AMEND Schedule 1 to introduce a sub-catchment planned approach with the Farm Environment Plan as a monitoring tool AND AMEND to use Farm Environment Plans as a tool to understand land use suitability and manage contaminant loss AND AMEND to include a range of actions in Farm Environment Plans, such as avoid farming older cattle on slopes in winter or when wet; farm cattle extensively on slopes; fence off swamps and plant out to provide silt traps to remove sediment; construct sediment traps near the headwaters to help slow flow and trap sediment; plant shade trees away from waterways to discourage stock camps and nutrient build-up; use temporary electric fencing where and when necessary; plant poplar poles on erosion prone slopes; identify suitable units for planting pines at farmer discretion; fence off waterways on more intensively farmed areas of the farm and provide reticulated water for stock.	Support in part Oppose in part	<p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ considers that care needs to be adopted in using a FEP as a monitoring tool. For example, FFNZ considers that sufficient flexibility ought to be provided for things like climatic events and that farmers should not be rigidly held to comply with detailed actions in FEPs (see FFNZ's submission on Variation 1 including amendments to Policies 2A and 2B, amendments to controlled activity rule and amendments to Schedule 1).</p> <p>FFNZ does not support the use of FEPs as a tool to understand LUS for reasons including that FFNZ does not support allocation and considers that FEPs ought to be tailored, flexible and the information should not be used for any other purpose.</p> <p>FFNZ agrees that the FEP ought to provide for a range of actions but considers that these should not be detailed in PC1 in a prescriptive way or limited in any way.</p>
Fertiliser Association of New Zealand	PC1-10650	Schedule 1	AMEND Schedule 1(2) to read: "(d) An assessment of appropriate land use and grazing management for	Oppose in part	FFNZ considers that Schedule 1(d) ought to be deleted. FFNZ does not support an approach of matching land use to land capability for reasons

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73305			<p>specific areas on the farm in order to maintain and improve the physical and biological condition of soils and minimise the diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens to water bodies, including:</p> <p>(i) matching land use to land capability; and (ii) identifying areas not suitable for grazing; and (iii) stocking policy to maintain soil condition and pasture cover; and (iv) to appropriate location and management of winter forage crops; and (v) suitable management practices for strip grazing.</p> <p>(e) A description of nutrient management practices including a nutrient budget <u>prepared by a Certified Nutrient Management Advisor</u> for the farm enterprise calculated using OVERSEER in accordance with the OVERSEER use protocols <u>Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B, Table 1,</u> or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council.</p> <p>...</p> <p>5(a) Actions, timeframes and other measures to ensure that the diffuse loss discharge of nitrogen from the property or enterprise...</p>		<p>including that LUC may have merit as a decision support tool but it is not a reasonable proxy for nitrogen or other contaminants, using it in this way is likely to impose significant cost for no net benefit and is likely to be used to justify or inform an allocation approach.</p> <p>In the event that this appeal point is not successful, FFNZ would support an approach of deleting paragraph (i) as proposed by this submitter.</p> <p>FFNZ would support the change in terminology to Certified Nutrient Management Advisor provided that this does not unreasonably reduce the pool of people available to prepare NRPs or increase the cost to farmers or make compliance more stringent.</p> <p>FFNZ considers that more flexibility is required in paragraph (e) to provide for changes to the input standards and therefore does not support the proposal to limit this to just the exceptions in Schedule B without also amending Schedule B as proposed in FFNZ's submission on Variation 1 or to otherwise provide sufficient flexibility and tailoring.</p> <p>FFNZ agrees with the use of the word "loss" and "to water".</p> <p>In respect of the references to BPO and GMP, In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.</p>

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			(b) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen <u>to water</u> is reduced <u>using best practicable options in keeping with industry agreed good management practice, prior to nitrogen loss allocation systems being decided and introduced. so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, except in the case of Rule 3.11.5.5."</u>		FFNZ considers that GMP ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1). FFNZ agrees that there should be no signal about allocation systems being decided.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-12401	Schedule 1	Schedule 1 - DELETE Row number 7 from the table under Vegetable Growing Minimum Standards. AND AMEND Row 8 from the table under Vegetable Growing Minimum Standards to read: " <u>8-7 - Nitrogen Phosphorous - Evidence available to demonstrate split applications by block/crop in accordance with the Code of Practice for Nutrient Management (with emphasis on fertiliser use), which includes calibration of application equipment, following expert approved practice relating to:...</u> "	Support in part	FFNZ would support the proposed changes if the effect tis to make the table more flexible and more appropriate, reasonable, practical and affordable for commercial vegetable growers.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10559	Schedule 1	AMEND Schedule 1 paragraph 5 to read: "This schedule applies to all farming activities, but it is acknowledged that some provisions will not be relevant to every farming activity.	Support in part Oppose in part	FFNZ supports the submission point if the intention is to ensure that all land uses adopt a FEP approach and this results in consistency across land uses or sectors.

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			<p><u>Any management plan required by a condition of any resource consent authorising industrial or other wastewater irrigation shall be deemed to be Farm Environment Plan for the purposes of this schedule, provided that the management plan addresses the relevant matters in Section A.</u> AND ADD a NEW item 'g' to Section 2 (immediately above Section 3): <u>"g. A description of any other wastewater irrigation or fertiliser management activities on the site including the use of fertilised replacements."</u></p>		<p>FFNZ agrees with the addition of a new paragraph "g" provided that this simply records these activities undertaken and is not used to make them more stringent (save for a critical source area assessment using the MPA framework referred in FFNZ's submission on Variation 1).</p>
<p>Fonterra Co-operative Group Ltd Submitter ID: 74057</p>	<p>PC1-12404</p>	<p>Schedule 1</p>	<p>AMEND Schedule 1 part 5 to read: "...5. A description of the following: a. Actions; The property or enterprise's Nitrogen Reference Point timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by that is not to be exceeded by the five <u>three-year</u> rolling average annual nitrogen loss as determined by the use of the current <u>most recent</u> version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; or ..."</p>	<p>Oppose in part</p>	<p>FFNZ agrees that paragraph (a) ought to refer to the NRP (subject to FFNZ's view that it should not be used to grandparent) and would support simplifying this wording but considers that consideration needs to be given to how compliance with the NRP would be enforced (FFNZ has concerns about compliance with an Overseer number) and FFNZ considers that it ought to be calculated on a five year rolling average basis.</p> <p>FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that flexibility ought to be provided for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.</p>

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GBC Winstone Submitter ID: 73992	PC1-3623	Schedule 1	AMEND Schedule 1 A. 2. as follows: "An assessment of the risk... having regard to <u>Objective 3</u> sub-catchment targets in Table 3.11-4 and the priority of lakes ..."	Oppose in part	FFNZ considers this paragraph ought to be deleted (see FFNZ's submission on Variation 1). However, in the even that submission point is not accepted FFNZ would support the amendment if Objective 3 was changed as proposed in FFNZ's submission on Variation 1.
Gleeson, Graeme B Submitter ID: 73800	PC1-12417	Schedule 1	DELETE Schedule 1 requirements to manage farming activities to a historic Nitrogen Reference Point AND REPLACE with live weight standards linked to the natural capital of soils, climate and assimilative capacity of water OR allocate nitrogen as it is tied to the natural capital of soils. AND AMEND OR ADD new rules that are based on land class and pasture production capability, where land use is supported by the capability of the land giving rise to contaminant loss no greater than acceptable ecosystem health limits OR ADOPT equal nitrogen allocation flexibility for all land users (at 20kgN/ha) as a permitted activity. AND DELETE 75th percentile nitrogen leaching value AND REPLACE with requirements and standards that ensure the reductions required in over-allocated catchments, and where nitrogen is an issue, are proportionate to the level of improvement required and the impact of the discharge. Highest dischargers should be targeted first and consideration should be given to the economic implications of reducing	Oppose in part	<p>FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ does not support an alternative natural capital approach based on soils or live weights or pasture production capability or anything similar.</p> <p>FFNZ has concerns that if the approach was adopted such that the highest nitrogen discharges had to reduce that would not take into account their particular circumstances e.g. a good farm system on leaky soils or high rainfall could be twice the nitrogen number of a poor farm system on better soils and low rainfall. It is not necessarily the high nitrogen farm that should or is able to reduce. FFNZ considers that funding and timeframes and/or a reasonable consenting process would need to be considered and available.</p> <p>FFNZ does not support an equal allocation approach for reasons including that FFNZ opposes allocation and this is a blunt and untailored</p>

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			<p>and the timeframe for making reductions. AND AMEND the rules to ensure low contaminant loss land uses are a permitted activity. AND AMEND to ensure that high nitrogen dischargers, except horticulture, are required to reduce over time, starting immediately, and achieving 10 per cent reductions every year for the life of PPC1. AND AMEND to ensure horticultural nitrogen losses are managed in a manner that recognises the value of the industry to the community.</p>		<p>approach that will likely result in significant cost for no net benefit.</p> <p>FFNZ does not agree to an approach that targets “over allocated” catchments for reasons including that it does not support the 80 year numeric targets.</p> <p>FFNZ does agree that economic implications and timeframes need to be taken into account that that low contaminant land uses should be a permitter activity.</p> <p>FFNZ does not support a one size fits all approach that requires 10% reductions (or something similar). FFNZ considers that a tailored approach ought to be adopted.</p> <p>FFNZ agrees that the value of horticulture to the community ought to be recognised but that the same applies to all activities.</p>
<p>Gleeson, Graeme B Submitter ID: 73800</p>	<p>PC1-12418</p>	<p>Schedule 1</p>	<p>Schedule 1 - WITHDRAW PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment. AND AMEND to adopt a sub-catchment approach to focus on contaminants important to each farm and sub-catchment. AND DEVELOP greater understanding about spatial location of natural resources so this knowledge can be applied to better inform and manage contaminant loss.</p>	<p>Oppose in part</p>	<p>FFNZ agrees that further information and robust science is needed. FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p> <p>FFNZ does not support understanding spatial location if this is used to inform or justify an allocation approach because it considers that it is premature and the use of any information gathered should solely be for the purposes of tailored FEPs.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
<p>Gleeson, Graeme B Submitter ID: 73800</p>	<p>PC1-6407</p>	<p>Schedule 1</p>	<p>AMEND Schedule 1 to ensure that Farm Environment Plans are as uncomplicated as possible, including plans that are hand-written. AND AMEND to ensure supporting documents outlining Good Management Practices, as recognised by industry, are readily available to all land users. AND AMEND to ensure that Farm Environment Plans include who will be responsible for and when and how mitigation will occur. There may be financial limitations for the farm business for mitigation. AND AMEND so that phosphorus, sediment and microbial pathogens are managed through Farm Environment Plans and Good Management Practice. AND AMEND to ensure strong and clear communication high sediment losses and the options available to mitigate them AND AMEND the rules so that farms with a low risk of contaminant loss are enabled to operate for the next 10 years as a permitted activity, subject to conditions relating to stocking rate and the preparation of a Beef and Lamb New Zealand Land and Environment Plan Level 1 and 2 or equivalent, and adopting industry-supported Good Management Practice.</p>	<p>Support in part Oppose in part</p>	<p>FFNZ agrees that FEPs ought to be uncomplicated and all options provided for including hand written or submission by online portal.</p> <p>FFNZ supports guidelines or guidance documents but considers that GMP is evolving and ought to be provided as a guide and not prescriptive.</p> <p>FFNZ agrees that identifying responsibility would likely be helpful and that financial implications ought to be taken into account.</p> <p>FFNZ agrees that low risk contaminant loss properties should be enabled but considers that this should be considered in the context of the sub-catchment and farm system/type as opposed to an absolute number. FFNZ does not support input controls like the stocking rate proposed by this submitter. It also does not support a regulatory requirement to adopt GMP.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. So does not support the removal of that option but would support the provision of an additional permitted activity option.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND to ensure that low risk land users are able to continue as a permitted activity without the need to prepare a Farm Environment Plan.</p> <p>AND AMEND Rule 3.11.5.3 to be a Permitted Activity where a Farm Environment Plan is provided AND REMOVE the requirement to be under a Certified Industry Scheme.</p> <p>AND AMEND to extend the timeframes required for Farm Environment Plans.</p> <p>AND AMEND to ensure that Farm Environment Plans adopt a tailored individual approach.</p> <p>AND AMEND Farm Environment Plans to ensure they assess appropriate land use options for each farm, and encourage better science to determine which contaminants are of concern for each farm and sub-catchment.</p>		
Greenlea Premier Meats Ltd Submitter ID: 72144	PC1-7540	Schedule 1	<p>DELETE requirements for land use activities to not exceed their historic nitrogen discharge levels when below 20kgN/ha/yr.</p> <p>AND AMEND to enable low leaching and land uses (below 20kgN/ha/yr) to increase discharges up to 20kgN/ha/yr.</p> <p>AND AMEND by basing the nitrogen allocation system on the natural capital of soils taking into consideration the assimilative capacity of freshwater.</p>	Support in part Oppose in part	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports an approach that provides flexibility for low intensity farmers to increase. It considers that the threshold is likely to be 15kgN or some</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>other permitted baseline (see FFNZ's submission on Variation 1) but would support 20kgN if it was supported by a robust section 32 assessment.</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p> <p>FFNZ also considers that there is no reliable proxy for natural capital and that it is not appropriate to allocate on this basis.</p>
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5789	Schedule 1	<p>AMEND Schedule 1 by replacing reliance on Farm Environment Plans with a Best Practicable Options approach to be implemented immediately.</p> <p>OR AMEND, if Farm Environment Plans are retained, by expanding Schedule 1 to include specific and straight forward actions that are known to be viable and reduce contaminant loss.</p>	Oppose	<p>In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc.</p> <p>Therefore FFNZ does not agree with amendments to replace FEPs with BPO.</p>
Hill Country Farmers Group Submitter ID: 73321	PC1-7932	Schedule 1	<p>AMEND Schedule 1 stock exclusion requirement to align with the Align National Policy Statement for Freshwater Management.</p> <p>AND AMEND to provide clear and consistent guidance on stock</p>	<p>Support in part</p> <p>Oppose in part</p>	FFNZ is concerned that there are no national stock exclusion requirements and the draft regulations had several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach that is not based on slope but

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>crossing requirements and slope interpretation for mandatory fencing. AND REMOVE from PPC1 the requirement for fencing to 25 degrees AND REPLACE with mitigation actions to target critical source areas above 15 degrees. AND AMEND Schedule 1 to read "...A Farm Environment Plan shall be prepared in accordance with the requirements of A below. The Farm Environment Plan shall be certified as meeting the requirements of A by a Certified Farm Environment Planner or an approved landowner</p> <p>2. An assessment of the risk ... ; and</p> <p>(ii) for areas with a slope exceeding 25 and where stream fencing is impracticable, the provision of alternative mitigation measures.</p> <p>(b) A description of setbacks and riparian management, including:</p> <p>(i) The management of water body margins including how damage to the bed and margins of water bodies, and the direct input of contaminants will be avoided, and how riparian margin settling and filtering will be provided for; and</p> <p>(ii) Where practicable the provision of minimum grazing setbacks from water bodies for stock exclusion of 1 metre for land with a slope of less than 15° and 3 metres for land between 15 °and 15° <u>where break</u></p>		<p>instead based on stock units or a narrative approach (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ is concerned that approaching setbacks and stock exclusion on the basis of slope has several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach based on stock units or a narrative description of when stock exclusion is required or something similar when assessing other restrictions based on slope(see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome.</p> <p>Having said this, FFNZ agrees that farmers need to be involved in the preparation of FEPs.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>feeding occurs; and (iii) The provision of minimum cultivation setbacks of 5 metres <u>unless effects of diffuse discharges can be mitigated.</u> ... (e) A description of nutrient management practices including a nutrient budget for the farm enterprise calculated using the model OVERSEER® in accordance with the OVERSEER® use protocols, or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council. (f) A description of cultivation management, including: ... (i) The identification of slopes over ... that cultivation can be avoided <u>mitigated</u>; and 3. A spatial risk map(s) at a scale that clearly shows: (a) The boundaries of the property; and (b) The locations of the main land uses that occur on the property; and (c) The locations of existing and future mitigation actions to manage contaminant diffuse discharges; and (d) Any relevant internal property boundaries that relate to risks and mitigation actions described in this plan; and (e) The location of continually flowing rivers, streams, and drains <u>that exceed 1m wide and 30cm deep on average</u> and permanent lakes, ponds</p>		<p>FFNZ agrees with the amendments to paragraph 2 in the alternative and in the event the change it seeks to Schedule 1 in its submission on Variation 1 are not successful.</p> <p>FFNZ agrees that the requirements in paragraph (e) ought to apply to accord water bodies.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>and wetlands; and (f) The location of riparian vegetation and fences adjacent to water bodies; and (g) The location of critical source areas for contaminants, as identified in 2 (c) above.... 5. A description of the following: (a) Actions, timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by the five-year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER®, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; or (b) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, except in the case of Rule 3.11.5.5."</p>		
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10215	Schedule 1	ADD a NEW Schedule 1C to provide for sub-catchment scale solutions AND ADD a NEW Schedule 1C to read as follows: "Schedule 1C - Requirements for a sub-catchment scale management plan applying to Rule 3.11.5.X iv -	Oppose	FFNZ supports tailored FEPs but it does not support sub-catchment collectives managing contaminants for reasons including that this is likely to involve allocation (FFNZ does not support allocation), potentially gives significant power to catchment collectives, the potential for abuse of that power and the potential significant cost.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective.</u> <u>A sub-catchment scale management plan (SSMP) shall be prepared in accordance with the requirements below.</u> <u>1) The (SSMP) must be approved by the Regional Council Chief Executive before an application under Rule 3.11.5.X can be granted by the Council.</u> <u>2) The SSMP must meet or exceed the expected reduction in discharges to freshwater that would be achieved through completing and implementing a farm or enterprise scale farm environment plan in accordance with Schedule 1 and Schedule 1b. The achievement in reduction of discharges must be comparable when considered over all of the properties and enterprises managed by the SSMP.</u> <u>3) The SSMP must be the responsibility of a legal entity that is accountable for achieving compliance with the conditions of a resource consent issued under Rule 3.11.5.X.</u> <u>4) The SSMP must be supported by a decision support tool that is able to be utilised as the accounting framework for the relevant sub-catchment. The decision support tool must:</u></p>		<p>FFNZ considers the approach in its submission on Variation 1 which includes tailored FEPs based on catchment profiles and MPA to identify mitigations is more appropriate.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>a) Calibrate discharges and hydrological flows to observed monitoring sites within the catchment. The calibration must achieve at least achieve a 'Satisfactory' criteria for a daily model with NSE - 0.6, % bias- +/- 25% and the decision support tool must be capable of continuous upgrade and improvement.</u></p> <p><u>b) Be capable of integrating with other sub-catchment, freshwater management unit and catchment scale accounting systems.</u></p> <p><u>c) Be able to measure mitigations for microbial, sediment, nitrogen and phosphorus discharges at all scales within the domain of the decision support tool to a standard approved by peer review agent approved by the Chief Executive of the Regional Council.</u></p> <p><u>d) Be made available to the Council for use in assessing compliance with the load limit targets for the relevant sub-catchment listed in Schedule 1C Table XX.</u></p> <p><u>5) The SSMP must clearly identify how any specified consent condition will be complied with.</u></p> <p><u>6) The SSMP shall contain as a minimum:</u></p> <p><u>a) The name of the legal entity registered with the Waikato Regional Council. Information provided by the Council from registration between 1</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>Sep 2018 and 31 March 2019.</u> <u>b) A legal description of all properties and enterprises the legal entity described in Schedule 1C 3) above have legal authority to act on behalf of.</u> <u>c) A description of the nature of enterprises, farms and properties and the domain of the SSMP.</u> <u>d) An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the activities within the SSMP domain, and the priority of those identified risks, having regard to sub-catchment load targets in Schedule 1C Table XX below.</u> <u>e) A schedule of approved mitigation actions and target completion dates."</u> AND ADD Schedule 1C Table XX referred to in the submission.</p>		
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-12435	Schedule 1	AMEND Schedule 1 to split commercial vegetable cropping farm plans into a new Schedule 1B AND DELETE the vegetable growing minimum standards from Schedule 1 AND ADD a NEW Schedule 1B to read as follows: <u>"Schedule 1B - Requirements for Farm Environment Plans for commercial vegetable production enterprises</u> <u>1. A Farm Environment Plan shall be prepared in accordance with the requirements of A below. The Farm</u>	Support in part Oppose in part	<p>In principle, FFNZ sees there could be merit in splitting commercial vegetable cropping farm plans where their activity is significantly different. However, it considers that Schedule 1 as amended by its submission would provide for sufficient tailoring to any farm system or type.</p> <p>FFNZ agrees that FEPs should not be incorporated into consent conditions.</p> <p>FFNZ supports the proposed Schedule to the extent that it is consistent with its submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>Environment Plan shall be certified as meeting the requirements of A by a Certified Farm Environment Planner (commercial vegetable production).</u></p> <p><u>2. The construction of a farm plan does not require duplication of material within existing farm environment plans that are considered sufficient for purpose by a Certified Farm Environment Planner (commercial vegetable production).</u></p> <p><u>3. Farm plans are not required to duplicate material provided to Waikato Regional Council for the purpose of complying with other rules in the plan.</u></p> <p><u>4. Farm Plans will not be incorporated into consent conditions as a whole; but matters of control or discretion will include relevant actions committed to by the consent holder.</u></p> <p><u>5. The Farm Environment Plan shall identify key risk areas for the discharge of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants where practicable.</u></p> <p><u>The Farm Environment Plan must clearly identify how any specified consent condition will be complied with.</u></p> <p><u>A Farm Environment Plans shall contain as a minimum:</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>1. The name of the legal entity registered with the Waikato Regional Council.</u></p> <p><u>2. Information provided by the Council from registration between 1 Sep 2018 and 31 March 2019.</u></p> <p><u>3. A description of the enterprise, detailing the general rotational cropping system, properties owned, leased and otherwise farmed on over time. This will include the legal description for each parcel of land.</u></p> <p><u>4. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the farming activities on the property, and the priority of those identified risks, having regard to sub-catchment targets in Table 3.11-1 and the priority of lakes within the sub-catchment. As a minimum, the risk assessment shall include:</u></p> <p><u>a. A risk assessment for nutrient discharges that is approved by a Certified Farm Environment Planner (commercial vegetable crops). The risk assessment should be equivalent to the process outlined in Section 4 of the Horticulture New Zealand Code of Practice for Nutrient Management Version 1.0 August 2014.</u></p> <p><u>b. A risk assessment for soil conservation purposes, that is approved by a Certified Farm Environment Planner (commercial</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>vegetable crops). The risk assessment should be equivalent to the process outlined in Section 1 of the Horticulture New Zealand Erosion & Sediment Control Guidelines for Vegetable Production Version 1.1 June 2014.</u></p> <p><u>c. If manures are used, undertake a microbiological discharge risk assessment.</u></p> <p><u>5. If stock are present on land managed within the enterprise, provisions of Schedule 1 relating to the farming of animals apply. If stock are present a risk assessment for stock related discharges must be undertaken .</u></p> <p><u>6. A schedule of mitigation actions and target completion dates derived from the risk assessments undertaken in 4 and 5 above.</u></p> <p><u>7. Vegetable Growing Minimum Standards</u> <u>Farm environment plans required under Rule 3.11.5.5, 3.11.5.6b, or 3.11.5.X shall, in addition to the matters set out above, ensure the following matters are addressed."</u> AND INCLUDE the table for Vegetable Growing Minimum Standards as laid out in the submission.</p>		
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-12436	Schedule 1	AMEND Schedule 1 to read: "A Farm Environment Plan shall be prepared in accordance with the requirements of A below. The Farm	Support in part	In principle, FFNZ sees there could be merit in splitting commercial vegetable cropping farm plans where their activity is significantly different. However, it considers that Schedule 1 as amended

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Environment Plan shall be certified as meeting the requirements of A by a Certified Farm Environment Planner. The Farm Environment Plan shall identify all sources of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants.</p> <p>The Farm Environment Plan must clearly identify how specified minimum standards will be complied with.</p> <p>The requirements set out in A apply to all Farm Environment Plans, including those prepared within a Certified Industry Scheme. <u>A separate schedule has been prepared for commercial vegetable cropping systems and plans prepared by catchment collectives.</u></p> <p>This Schedule <u>1</u> applies to all farming activities <u>other than commercial vegetable cropping systems</u>, but it is acknowledged that some provisions will not be relevant to every farming activity.</p> <p>...</p> <p>2. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the farming activities on the property, and the priority of those identified risks,</p>	Oppose in part	<p>by its submission would provide for sufficient tailoring to any farm system or type.</p> <p>If they are split, FFNZ considers that significant amendment is needed to Schedule 1 as set out in its submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>having regard to sub-catchment targets in Table 3.11-1 and the priority of lakes within the sub-catchment. As a minimum, the risk assessment shall include (where relevant to the particular land use):</p> <p>...(b) A description of setbacks and riparian management, including:</p> <p>... (iii). The provision of minimum cultivation setbacks of 5 metres <u>and/or any other practicable measures considered necessary in an erosion and sediment control plan.</u></p> <p>(c) A description of the critical source areas from which sediment, nitrogen, phosphorus and microbial pathogens are lost, including:</p> <p>(i) the identification of intermittent waterways, overland flow paths, <u>cultivated land</u> and areas prone to flooding and ponding, and an assessment of opportunities to minimise losses from these areas through appropriate stocking policy, stock exclusion and/or measures to detain floodwaters and settle out or otherwise remove sediment, nitrogen, phosphorus and microbial pathogens (e.g. detention bunds, sediment traps, natural and constructed wetlands); and</p> <p>...</p> <p>(iii) an assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens from <u>cultivated land,</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>tracks and races and livestock crossing structures to waterways, and the identification of appropriate measures to minimise these discharges (e.g. cut-off drains, and shaping); and</p> <p>...</p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>(a) The boundaries of the property; and</p> <p>(b) The locations of the main relevant land uses <u>activities</u> that occur on the property;</p> <p>...</p> <p>5. A description of the following:</p> <p>(b) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, except in the case of Rule 3.11.5.5."</p>		
<p>Maniapoto Maori Trust Board Submitter ID: 73730</p>	<p>PC1-9366</p>	<p>Schedule 1</p>	<p>AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain...</p> <p>1.c. A list of land parcels which...</p> <p>i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that the FEP ought to be able to be prepared on a property or farm enterprise basis.</p> <p>FFNZ considers that it is likely to be too onerous to show the location of fencing and does not support this as a mandatory requirement.</p> <p>FFNZ is concerned that the requirement for an "opinion on material differences" is ambiguous, has the potential to create disputes and would likely impose significant cost.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u></p> <p>2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u>, and the priority of...</p> <p>a. A description of where and how...</p> <p>i. the <u>location and</u> provision of fencing and livestock...</p> <p>ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...</p> <p>c. A description of the critical source areas...</p> <p>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses from<u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; and</p> <p>ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u></p> <p>f. A description of cultivation management..</p> <p>d. <u>Establishing and</u> maintaining appropriate buffers...</p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>a. The boundaries of the property <u>or enterprise (if different); and...</u></p>		<p>FFNZ is concerned that the proposed amendments to paragraphs 4, 5 and 6 are likely to be more stringent and impose significant cost for no net benefit. FFNZ opposes these amendments and considers that Schedule 1 ought to be amended as set out in its submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>4. A <u>detailed</u> description of the following: <u>Mitigation actions, timeframes and other measures to reduce the diffuse discharges of phosphorus, sediment and microbial pathogens that will be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time-bound actions will be undertaken, and when and to what standard they will be completed.</u></p> <p>5. A <u>detailed</u> description of the following: a. <u>Mitigation</u> actions, timeframes and other...</p> <p>6. A programme of works that sets out: a. <u>The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u> i. <u>Record of inspection by Waikato Regional Council staff or;</u> ii. <u>Record of inspection by Certified Industry Scheme staff; and</u> iii. <u>Record of audit by independent third party accredited auditor.</u></p> <p>7. <u>A version control table that sets out the date of any amendment to the Farm Environment Plan and the content of the amendment to the Farm Environment Plan.</u></p> <p>8. <u>A declaration from the Certified Farm Environment Planner</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>confirming the best available and most accurate information was use for the promulgation and design of mitigation actions."</u>		
Matamata-Piako District Council Submitter ID: 73419	PC1-3689	Schedule 1	AMEND to provide evidence with respect to Schedule 1, that the section 32 evaluation confirms this is the preferred approach to adopt regarding the efficiency and effectiveness of this method and rule AND ENSURE collaboration with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes AND AMEND to review the extent, complexity and information requirements for Farm Environment Plans to reduce potential consultancy, compliance and audit costs to the landowner and regulator AND AMEND to simplify the extent, complexity and information requirements AND AMEND to justify the current approach in terms of the effectiveness and efficiency tests under section 32.	Support	FFNZ agrees that FEPs ought to be simple, reasonable, practical and affordable. FFNZ agrees that they ought to be supported by a robust section 32 assessment and the principles or framework developed in collaboration with key stakeholder etc.
Miraka Limited Submitter ID: 73492	PC1-12465	Schedule 1	ADD to Schedule 1 a new clause to the effect that Waikato Regional Council will provide Best Management Practice guidelines for actions or measures to mitigate contaminant discharge in relation to a range of land uses, stock policies,	Oppose in part	FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			land types and other biophysical factors, and that such mitigating actions or measures are to be included in Farm Environment Plans and implemented on all properties and enterprises across the region.		the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1). FFNZ is concerned that the submitter's proposal will be too stringent and not sufficiently flexible. FFNZ prefers an approach based on tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.
New Zealand Association of Resource Management Submitter ID: 71702	PC1-7991	Schedule 1	AMEND Schedule 1 to ensure that Certified Farm Environment Planners provide certified evidence of having undertaken and completed specialist training in land use capability mapping, and also submit at least two land use capability farm maps they have prepared, for peer review by expert Catchment Management staff of Waikato Regional Council. AND AMEND to ensure that suitable training courses are offered to staff and consultants for upskilling on land use capability mapping at farm scale level.	Support in part Oppose in part	FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome. FFNZ supports a robust framework for certification provided it is not unreasonable and provided it enables and encourage a range of certified people and large enough pool of people to address demand for FEPs.
New Zealand Grain and Seed Trade Association Submitter ID: 71229	PC1-1676	Schedule 1	AMEND Schedule 1 to replace the proposed 5 metres setback distance with the current industry agreed cultivation setback distance of 2 metres from permanent waterways. AND AMEND to further clarify AND OR define how the 15 degree slope restriction will be interpreted (i.e. part of the paddock and apply to all the paddock, the paddock average, how and who calculated) and what are	Support in part Oppose in part	FFNZ agrees that the 5m setback for cultivation is too high. It considers that setbacks ought to be contained in Schedule C and the minimum setback ought to be 1m with a different approach able to be taken in the context of a critical source area and MPA assessment for a particular FEP (see FFNZ's submission on Variation 1). In the event that FFNZ's submission is not successful, it would support 2m in the alternative.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			accepted mitigations above 15 degrees slope. AND CLARIFY the science to support the 15 degree slope gradient being the cut off measurement.		FFNZ is concerned that approaching setbacks and stock exclusion on the basis of slope has several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach based on stock units or a narrative description of when stock exclusion is required or something similar when assessing other restrictions based on slope(see FFNZ's submission on Variation 1).
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4648	Schedule 1	RETAIN Schedule 1.	Support in part Oppose in part	FFNZ thinks that Schedule 1 ought to be retained but that it requires significant amendment as set out in its submission on Variation 1.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11867	Schedule 1	AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain... 1.c. A list of land parcels which... i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ... iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u> 2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u> , and the priority of... a. A description of where and how... i. the <u>location and</u> provision of fencing and livestock...	Support in part Oppose in part	FFNZ agrees that the FEP ought to be able to be prepared on a property or farm enterprise basis. FFNZ considers that it is likely to be too onerous to show the location of fencing and does not support this as a mandatory requirement. FFNZ is concerned that the requirement for an "opinion on material differences" is ambiguous, has the potential to create disputes and would likely impose significant cost. FFNZ is concerned that the proposed amendments to paragraphs 4, 5 and 6 are likely to be more stringent and impose significant cost for no net benefit. FFNZ opposes these amendments and considers that Schedule 1 ought to be amended as set out in its submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>ii. for areas with a slope... is impracticable, the <u>location and provision of alternative...</u></p> <p>c. A description of the critical source areas...</p> <p>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses from<u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u></p> <p>ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u></p> <p>f. A description of cultivation management...</p> <p>d. <u>Establishing and maintaining appropriate buffers...</u></p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>a. The boundaries of the property <u>or enterprise (if different); and...</u></p> <p>4. A <u>detailed description of the following:</u> <u>Mitigation actions, timeframes and other measures to reduce the diffuse discharges of phosphorus, sediment and microbial pathogens that will be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time-bound actions will be</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>undertaken, and when and to what standard they will be completed.</u></p> <p>5. A <u>detailed</u> description of the following:</p> <p>a. <u>Mitigation</u> actions, timeframes and other...</p> <p>6. A programme of works that sets out:</p> <p>a. The timeframe for putting in place <u>and implementing the mitigation actions identified in (4) and (5) including:</u></p> <p>i. <u>Record of inspection by Waikato Regional Council staff or;</u></p> <p>ii. <u>Record of inspection by Certified Industry Scheme staff; and</u></p> <p>iii. <u>Record of audit by independent third party accredited auditor.</u></p> <p>7. A version control table that sets out the date of any amendment to the <u>Farm Environment Plan and the content of the amendment to the Farm Environment Plan.</u></p> <p>8. A declaration from the Certified Farm Environment Planner <u>confirming the best available and most accurate information was use for the promulgation and design of mitigation actions."</u></p>		
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8806	Schedule 1	AMEND Schedule 1 to reflect the reasons for the submission and the proposed alternative approach including to set out the information requirement aspects of the Farm Environment Plan as part of the rules.	Oppose	In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO as proposed by this submitter because it is effectively based on input

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>If Schedule 1 is retained then AMEND so that Schedule 1 is only for the purpose of providing information to support applications under Rule 3.11.5.6</p> <p>AND AMEND to clarify the practical application of the Farm Environment Plan including what actions are mandatory, how sub-catchment targets in Table 3-11.1 will be translated into Farm Environment Plan, how and who Farm Environment Plan will apply</p> <p>AND AMEND to specify Farm Environment Plan minimum standards to be complied with</p> <p>AND AMEND so that if a Farm Environment Plan is to be used to manage farming discharges it should cover all discharges regardless of whether they are diffuse or point source discharges</p> <p>AND AMEND to clarify the process that Farm Environment Plans can be amended.</p>		<p>controls and is likely to be inflexible, impractical cause significant cost, not address water quality etc.</p> <p>Therefore, FFNZ opposes the proposal to amend Schedule 1 to reflect the BPO approach promoted by this submitter or to limit it to solely applications under Rule 6.</p> <p>FFNZ consider that FEPs ought to be prepared in accordance with Catchment Profiles but that targets in Table 3-11.1 should not be translated into FEPs for reasons including that FFNZ does not support the 80 year numeric targets and does not support an allocation approach (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that there should be flexibility for FEPs to include point source discharges and this should not be mandatory.</p> <p>FFNZ considers that clarity ought to be provided in Schedule 1 and the policies and rules about amendments to FEPs as set out in FFNZ's submission on Variation 1.</p>
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-12475	Schedule 1	AMEND Schedule 1 to clarify the stock exclusion and setbacks requirements and amend wording is also too open in interpretation.	Oppose in part	FFNZ considers that minimum standards on stock exclusion and setbacks ought to be contained in Schedule C (see FFNZ's submission on Variation 1).
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-12476	Schedule 1	DELETE Clause (5) under Schedule 1.	Oppose in part	FFNZ considers that clause 5 requires amendment but considers that it ought to be retained. FFNZ refers to its submission on Variation 1 and the changes it seeks.
Open Country Dairy	PC1-5976	Schedule 1	AMEND Schedule 1 so that initially farmers prepare their own Farm Environment Plans which may be	Oppose in part	FFNZ considers that it is appropriate for FEPs to be prepared by certified planners and considers that this means that Council has control over the

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74182			replaced by certified plans at a later date.		certification of planners and not the content of FEPs. FFNZ is concerned that if FEPs could be prepared by non certified or qualified persons, WRC would need to retain control over FEPs and that would likely be a worse outcome. Having said this, FFNZ agrees that farmers need to be involved in the preparation of FEPs.
Pamu Farms of New Zealand Submitter ID: 74000	PC1-5753	Schedule 1	AMEND Schedule 1 to provide funding and transparency for Certified Farm Environment Planners AND AMEND so that Farm Environment Plans are bonded to ensure that the attainment of targets is maximised. OR AMEND to list and prohibit bad on-farm practice in the areas that the Farm Environment Plan would seek to address.	Oppose in part	FFNZ agrees with funding and would see merit in transparency as long as that was in terms of FEP requirements and not in terms of disclosing private and confidential information. FFNZ opposes the proposal to bond FEPs and considers this to be inappropriate for reasons including that flexibility is needed in FEPs and that this is likely to result in significant cost for no net benefit. FFNZ opposes the proposal to prohibit bad on farm practice for reasons including that this is a blunt and blanket approach, is likely to result in significant cost for no net benefit and FFNZ considers the best water quality gains for most reasonable cost can be made through tailored and proportionate FEPs guided by MPA (see FFNZ's submission on Variation 1).
Pamu Farms of New Zealand Submitter ID: 74000	PC1-12479	Schedule 1	AMEND Schedule 1 to clarify the intent and capture of clause 5(a) and (b) if they are retained.	Support in part	FFNZ agrees that paragraphs 5a and b ought to be clarified, including to clarify how the NRP will be enforced. FFNZ considers they ought to be amended as set out in its submission on Variation 1.
Peterson and Carswell, Lance Colin and Sarah Submitter ID: 73899	PC1-12487	Schedule 1	AMEND PPC1 so that the whole cost of what has been proposed should not all go on farming	Support in part	FFNZ agrees that the costs involved are an important factor that need to be taken into account when selecting mitigations. FFNZ agrees that subsidies, incentives and funding ought to be available. FFNZ agrees that a balanced, tailored

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			<p>AND AMEND so more subsidies are available or more realistic and flexible provisions included</p> <p>AND AMEND so that a more balanced a tailored approach is taken</p> <p>AND AMEND to ensure more science and measureable approaches around water quality utilised.</p>		<p>and proportionate approach ought to be taken. FFNZ agrees there is a need for robust science but considers care needs to be taken with “measureable approaches” and FFNZ would not support this if it amounted to an allocation type approach.</p>
<p>Primary Land Users Group Submitter ID: 71427</p>	<p>PC1-11182</p>	<p>Schedule 1</p>	<p>AMEND Schedule 1 to read: "...2. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens...</p> <p>(a) A description of where and how stock shall be excluded from water bodies for stock exclusion including: ... (ii) for areas with a with a slope exceeding 25<u>15</u> degrees and where stream fencing is impracticable, the provision of alternative mitigation measures.</p> <p>(b) A description of setbacks and riparian management, including: ... (ii) Where practicable the provision of minimum grazing setbacks from water bodies for stock exclusion of 1 metre for land with a slope of less than 15 degrees and 3 metres for land with a slope between 15 degrees and 25 degrees <u>where break feeding occurs</u>; and</p> <p>(iii) The provision of minimum cultivation setbacks of 5 metres <u>unless effects of diffuse discharges can be mitigated.</u></p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ is concerned that the proposal to base fencing on slope has several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach based on stock units or a narrative description of when stock exclusion is required (see FFNZ’s submission on Variation 1).</p> <p>However, in the event that FFNZ’s appeal point is not successful it would support any proposal to make this less stringent such as 15 degree slope and excluding break feeding as proposed by the submitter.</p> <p>FFNZ agrees that the focus ought to be on mitigating and not avoiding.</p> <p>FFNZ has concerns about the amendments to paragraph f(ii) and considers that they ought to be clearly stated as examples and not rigid requirements.</p> <p>FFNZ agrees with the amendments in paragraph 3(e) which are similar to accord water bodies (see FFNZ’s submission on Variation 1).</p> <p>FFNZ agrees with the proposed deletion of references to the 75th percentile.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>...(f) A description of cultivation management including:</p> <p>(i) The identification of slopes over 15 degrees and how cultivation on them will be avoided; unless contaminant discharges to water bodies from that cultivation can be avoided <u>mitigated</u>; and</p> <p>(ii) How the adverse effects of cultivation on slopes of less than 15 degrees will be mitigated through appropriate erosion and sediment controls for each paddock that will be cultivated including by:</p> <ul style="list-style-type: none"> • <u>assessing where overland flows enters and exits the paddock in rainfall events; and</u> • <u>identifying appropriate measures to divert overland flows from entering the cultivated paddock; and</u> • <u>identifying measures to trap sediment leaving the cultivated paddock in overland flows; and</u> • <u>maintaining appropriate buffers between cultivated areas and water bodies (minimum 5m setback).</u> • <u>A description of collected animal effluent management including how the risks associated with the operation of effluent systems will be managed to minimise</u> 		<p>FFNZ considers that paragraph 5 could be retained provided that the NRP is not used as to grandparent or allocate and flexibility is provided for the use of Overseer. FFNZ has concerns about how Overseer will be enforced and considers that if it is on the basis of actions in FEPs the actions should not become conditions of consent and farms should not be rigidly micro managed. Flexibility in FEPs is important as are tailored, proportionate mitigations guided by MPA. FFNZ refers to its submission on Variation 1.</p> <p>However, in the event that FFNZ's submission on Variation 1 is not successful it would support this submitter's proposal to delete paragraph 5.</p>

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			<p><u>contaminant discharges to groundwater or surface water.</u></p> <ul style="list-style-type: none"> • <u>A description of freshwater irrigation management including how contaminant loss arising from the irrigation system to groundwater or surface water will be minimised.</u> <p>3. A spatial risk map(s) at a scale that clearly shows: ...<u>(e) The location of continually flowing rivers, streams, and drains that exceed 1m wide and 30cm deep on average and permanent lakes, ponds and wetlands; and</u> ... 5. A description of the following: (a) Actions, timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by the five year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; or (b) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to</p>		

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			<p>ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, except in the case of Rule 3.11.5.5."</p> <p>AND AMEND to provide guidance to clarify slope interpretation, fencing and stock watering and crossing requirements.</p>		
<p>Raukawa Charitable Trust Submitter ID: 74073</p>	<p>PC1-10584</p>	<p>Schedule 1</p>	<p>AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain...</p> <p>1.c. A list of land parcels which...</p> <p>i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</p> <p>iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u></p> <p>2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u>, and the priority of...</p> <p>a. A description of where and how...</p> <p>i. the <u>location and</u> provision of fencing and livestock...</p> <p>ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...</p> <p>c. A description of the critical source areas...</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that the FEP ought to be able to be prepared on a property or farm enterprise basis.</p> <p>FFNZ considers that it is likely to be too onerous to show the location of fencing and does not support this as a mandatory requirement.</p> <p>FFNZ is concerned that the requirement for an “opinion on material differences” is ambiguous, has the potential to create disputes and would likely impose significant cost.</p> <p>FFNZ is concerned that the proposed amendments to paragraphs 4, 5 and 6 are likely to be more stringent and impose significant cost for no net benefit. FFNZ opposes these amendments and considers that Schedule 1 ought to be amended as set out in its submission on Variation 1.</p>

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			<p>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses from<u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; and</p> <p>ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u></p> <p>f. A description of cultivation management...</p> <p>d. <u>Establishing and maintaining appropriate buffers...</u></p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>a. The boundaries of the property <u>or enterprise (if different); and...</u></p> <p>4. A <u>detailed</u> description of the following: <u>Mitigation actions, timeframes and other measures to reduce the diffuse discharges of phosphorus, sediment and microbial pathogens that will be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time-bound actions will be undertaken, and when and to what standard they will be completed.</u></p> <p>5. A <u>detailed</u> description of the following:</p>		

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			<p>a. <u>Mitigation</u> actions, timeframes and other...</p> <p>6. A programme of works that sets out:</p> <p>a. The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</p> <p>i. Record of inspection by Waikato Regional Council staff or;</p> <p>ii. Record of inspection by Certified Industry Scheme staff; and</p> <p>iii. Record of audit by independent third party accredited auditor.</p> <p>7. A version control table that sets out the date of any amendment to the Farm Environment Plan and the content of the amendment to the Farm Environment Plan.</p> <p>8. A declaration from the Certified Farm Environment Planner confirming the best available and most accurate information was use for the promulgation and design of mitigation actions."</p>		
Ravensdown Limited Submitter ID: 74058	PC1-10174	Schedule 1	<p>RETAIN the intent of Schedule 1. AND AMEND as follows:</p> <p>"2. (e) A description of nutrient management practices including a nutrient budget prepared by a Certified Nutrient Management Advisor for the farm enterprise calculated using the OVERSEER Model in accordance with the OVERSEER use protocols <u>Data Input Standards 2016</u>, with the exceptions</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ would support the change in terminology to Certified Nutrient Management Advisor provided that this does not unreasonably reduce the pool of people available to prepare NRPs or increase the cost to farmers or make compliance more stringent.</p> <p>FFNZ considers that more flexibility is required in paragraph (e) to provide for changes tot eh input standards and therefore does not support the proposal to limit this to just the exceptions in Schedule B without also amending Schedule B as</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>and inclusions set out in Schedule B, Table 1, or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council. The nutrient budget is to be valid for three years, unless there is a change in the farm system that requires the nutrient budget to be reviewed earlier."</u>		<p>proposed in FFNZ's submission on Variation 1 or to otherwise provide sufficient flexibility and tailoring.</p> <p>FFNZ opposes the proposed requirement for the nutrient budget to be valid for three years and considers that the timeframes ought to be longer and more flexible to reflect the nature of the specific farm system.</p>
Ravensdown Limited Submitter ID: 74058	PC1-12502	Schedule 1	<p>RETAIN the intent of Schedule 1. AND AMEND as follows: "5. (b) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse loss discharge of nitrogen is reduced <u>using best practicable options in keeping with industry agreed good management practice, prior to a nitrogen loss allocation system being decided and introduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, except in the case of Rule 3.11.5.5."</u> AND AMEND to address the following matters in the Schedule 1 table of vegetable growing minimum standards:</p> <ol style="list-style-type: none"> 1. No. 2 and 3 Nitrogen, Phosphorus – fertiliser plans should be prepared by Certified Nutrient Management Advisors 2. No. 4 Nitrogen, Phosphorus – annual calibration of fertiliser 	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees with the use of the word "loss" and "to water".</p> <p>In respect of the references to BPO and GMP, In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.</p> <p>FFNZ considers that GMP ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that there should be no signal about allocation systems being decided.</p> <p>FFNZ supports the amendments to the table of vegetable growing minimum standards to the extent that they are more flexible and less stringent than those in PC1 and they are reasonable, practical and affordable.</p>

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			<p>delivery systems could be a problem – many growers have their own spreading equipment.</p> <p>3. No. 6 Nitrogen, Phosphorus – not all commercial spreaders have the capability to document proof of fertiliser placement.</p> <p>No. 8 Nitrogen, Phosphorus – what constitutes 'evidence' needs clarification for growers who self-apply and for commercial entities who are not set up with GIS/GPS capability.</p>		
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5719	Schedule 1	<p>Nitrogen Reference Point Schedule 1: REMOVE the use of the OVERSEER Model or any other measuring tool in PPC1 until it is accurate both relatively and absolutely. AND DELETE the use of benchmarking or allocation. AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives. AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves. AND research a series of mitigations with strong data to support their efficacy and help introduce them. These will in combination with</p>	Support in part Oppose in part	<p>FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>If the amendments are made as proposed in FFNZ's submission on Variation 1 it would not support the proposal to delete the NRP and use of Overseer.</p> <p>FFNZ does not support any form of allocation, including grand parenting, for reasons including that there is no need to allocate and any consideration of allocation is premature.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			pollution levies have the greatest and fastest effect on water pollution.		<p>FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).</p> <p>FFNZ considers that care is required with any prosecution approach because there is significant uncertainty (including in measuring property discharges and the assumptions underlying targets). FFNZ considers that significant gains are likely to be made through farmers obtaining FEPs and that further gains can be made through education and industry support.</p>
Save Lake Karapiro Inc Submitter ID: 72459	PC1-12510	Schedule 1	Farm Environment Plans AMEND Schedule 1 so where stock intensity exceeds a critical value the BMP must be to increase the fenced margin. For land 10-15 degrees increase the setbacks to at least 3m.	Oppose	FFNZ does not support an approach based on BMP or input controls (e.g. stock intensity) or on adopting a slope approach to assessing setbacks and fencing.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11196	Schedule 1	AMEND and/or include further information in PPC1 in order to provide better certainty regarding Waikato Regional Council's expectations as to the content and level of detail which will be required for Farm Environment Plans. AND AMEND to clarify the relationship/interpretation of the stock exclusion requirements between Schedule C and Schedule 1 Farm Environment Plans.	Support in part Oppose in part	<p>FFNZ considers that further information regarding FEPs would likely be helpful but does not support additional prescription in PC1 because FFNZ considers that sufficient flexibility is needed to tailor FEPs to individual situations. FFNZ considers that further guidance could be provided through the development of guidance documents in consultation with stakeholders and industry.</p> <p>FFNZ agrees the relationship between Schedules C and 1 needs to be clarified and considers that this</p>

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					ought to be on the basis as proposed in FFNZ's submission on Variation 1.
South Waikato District Council Submitter ID: 72892	PC1-4171	Schedule 1	Provide evidence that the section 32 evaluation confirms Schedule 1 is the preferred approach to adopt regarding the efficiency and effectiveness of this method and rule AND AMEND to work with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes.	Support	FFNZ agrees that Schedule 1 ought to be supported by a robust section 32 assessment at that Council ought to work with stakeholders, landowners, industry etc and this could be done through the development of guidance documents and implementation guides.
South Waikato District Council Submitter ID: 72892	PC1-12522	Schedule 1	Schedule 1 - AMEND the extent, complexity and information requirements for Farm Environment Plans to reduce potential consultancy, compliance and audit costs to the landowner and regulator.	Support	FFNZ agrees that Schedule 1 should be amended to reduce the cost of preparing FEPs and costs of compliance.
South Waikato District Council Submitter ID: 72892	PC1-12523	Schedule 1	AMEND to simplify the extent, complexity and information requirements of Schedule 1 clause 2(b). AND provide information to justify the current approach in terms of the effectiveness and efficiency tests under section 32 in relation to Schedule 1 clause 2(b).	Support in part Oppose in part	FFNZ considers that paragraph 2b ought to be deleted. FFNZ considers that reasonable, practical and affordable minimum standards ought to be provided for in Schedule C and then FEPs ought to consider tailored and proportionate actions by assessing critical source areas and using the MPA framework (see FFNZ's submission on Variation 1). In the event that it is not deleted, FFNZ would support simplifying it.
Spectrum Dairies Limited Partnership Submitter ID: 73958	PC1-2763	Schedule 1	AMEND Schedule 1 to make Farm Environment Plans more like farm business plans that embrace positive change for better business rather than being regulated.	Support in part	FFNZ agrees that FEPs ought to be turned into a positive change for better business but is concerned that if they were treated as business plans they would also contain confidential and commercially sensitive information that should not be shared and may not be the appropriate format for such documents in the context of PC1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Spectrum Dairies Limited Partnership Submitter ID: 73958	PC1-12524	Schedule 1	AMEND Schedule 1 by taking a different approach to ascertain the base line and consider the management changes required to improve AND AMEND to use planning and logic to enable changes in farming practice such as land use change that reduces contaminant discharge in sensitive areas but increases it in less sensitive areas to achieve an economic and environmental benefit.	Support in part Oppose in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). If there was another way to "baseline" that did not involve allocation, LUC, LUS or similar allocation approaches FFNZ would support it in principle, but subject to understanding the proposal. FFNZ agrees that flexibility needs to be provided for land use change where the overall impact is better water quality e.g. nitrogen might increase but there might be greater reductions in phosphorous and E coli resulting in a better outcome for the sub-catchment.
Spectrum Dairies Limited Partnership Submitter ID: 73958	PC1-12525	Schedule 1	Schedule 1 - DELETE the requirement to be held at or below a property's Nitrogen Reference Point.	Support	FFNZ agrees that reasonable flexibility to increase nitrogen ought to be provided and considers this can be achieved with amendments to the policy and rule framework as proposed in FFNZ's submission on Variation 1.
Stark, Steven and Theresa Submitter ID: 73721	PC1-5228	Schedule 1	AMEND Schedule 1 by amending Farm Environment Plan requirements to change threshold for mandatory stock exclusion to the minimum standards for stock exclusion as set out in Ministry for the Environment's Clean Water document published February 2017 publication number ME 1293.	Support in part Oppose in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>FFNZ is concerned that there are no national stock exclusion requirements and the draft regulations had several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach that is not based on slope but instead based on stock units or a narrative approach (see FFNZ's submission on Variation 1).</p>
Stark, Steven and Theresa Submitter ID: 73721	PC1-12526	Schedule 1	Schedule 1 - DELETE the use of OVERSEER as a regulatory tool. If Nitrogen Reference Points are able to be used as a limiting factor at property level, the 5 year rolling average is to be retained.	Support in part	<p>FFNZ supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that farms should not be regulated to an Overseer number but likewise if the proposal is to regulate farms to actions in FEPs likely to achieve an Overseer number that should not be prescriptive, should not result in micro management, should provide reasonable flexibility and detailed actions in FEPs should not become conditions of consent.</p>
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9343	Schedule 1	AMEND Schedule 1 to include a stock exclusion measure that takes into account the length of waterway excluded, and/or the amount of fencing, and/or the area of planting, and /or the edge of field improvements and stock intensity. AND AMEND so that once the stock exclusion and edge of field	Oppose in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			improvements are achieved an Overseer based program could be considered. AND MAKE any other consequential amendments.		something that ought to be considered as part of a FEP and tailored to the particular situation. FFNZ agrees that edge of field mitigations ought to be taken into account in FEPs. It is not clear what is meant by adopting an Overseer based programme once stock exclusion and edge of field mitigations are achieved. FFNZ would support such an approach if it was based on allocation or used to grandparent nitrogen losses.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-12533	Schedule 1	Schedule 1 - RETAIN the 5 year rolling average if the Nitrogen Reference Point is retained. OR DELETE from Schedule 1 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.	Support in part Oppose in part	FFNZ supports the five year rolling average. FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ agrees that flexibility needs to be provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults. FFNZ does not support the use of Overseer for regulatory purposes including that there is uncertainty with the modelled number and version change and would also not support a micromanagement approach that managed farms to prescriptive actions in FEPs to try to achieve a modelled Overseer number that is subject to change (often through no change to farm system).
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-12534	Schedule 1	AMEND Schedule 1 to include a measurement system that targets E.coli and phosphorous as a precursor for the whole Farm Environment Plan. AND MAKE any other consequential amendments.	Oppose	FFNZ does not support allocation of any contaminant and is concerned that providing E coli and Phosphorous measurements and targets in FEPs would lead to an allocation approach. FFNZ is concerned that this would result in significant cost for no net gain and could have perverse outcomes including worse water quality outcomes compared

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					with management of critical source areas using MPA in FEPs as proposed in FFNZ's submission on Variation 1.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11817	Schedule 1	<p>AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain...</p> <p>1.c. A list of land parcels which...</p> <p>i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</p> <p>iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u></p> <p>2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u>, and the priority of...</p> <p>a. A description of where and how...</p> <p>i. the <u>location and</u> provision of fencing and livestock...</p> <p>ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...</p> <p>c. A description of the critical source areas...</p> <p>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses from<u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that the FEP ought to be able to be prepared on a property or farm enterprise basis.</p> <p>FFNZ considers that it is likely to be too onerous to show the location of fencing and does not support this as a mandatory requirement.</p> <p>FFNZ is concerned that the requirement for an "opinion on material differences" is ambiguous, has the potential to create disputes and would likely impose significant cost.</p> <p>FFNZ is concerned that the proposed amendments to paragraphs 4, 5 and 6 are likely to be more stringent and impose significant cost for no net benefit. FFNZ opposes these amendments and considers that Schedule 1 ought to be amended as set out in its submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>i. <u>a nutrient budget...Waikato Regional Council; and</u></p> <p>ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u></p> <p>f. <u>A description of cultivation management...</u></p> <p>d. <u>Establishing and maintaining appropriate buffers...</u></p> <p>3. <u>A spatial risk map(s) at a scale that clearly shows:</u></p> <p>a. <u>The boundaries of the property or enterprise (if different); and...</u></p> <p>4. <u>A detailed description of the following:</u> <u>Mitigation actions, timeframes and other measures to reduce the diffuse discharges of phosphorus, sediment and microbial pathogens that will be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time-bound actions will be undertaken, and when and to what standard they will be completed.</u></p> <p>5. <u>A detailed description of the following:</u></p> <p>a. <u>Mitigation actions, timeframes and other...</u></p> <p>6. <u>A programme of works that sets out:</u></p> <p>a. <u>The timeframe for putting in place and implementing the mitigation</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>actions identified in (4) and (5) including:</u> <u>i. Record of inspection by Waikato Regional Council staff or;</u> <u>ii. Record of inspection by Certified Industry Scheme staff; and</u> <u>iii. Record of audit by independent third party accredited auditor.</u> <u>7. A version control table that sets out the date of any amendment to the Farm Environment Plan and the content of the amendment to the Farm Environment Plan.</u> <u>8. A declaration from the Certified Farm Environment Planner confirming the best available and most accurate information was use for the promulgation and design of mitigation actions."</u>		
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8201	Schedule 1	AMEND Schedule 1(5)(a) to ensure that Farm Environment Plans provide for reductions, rather than maintaining the status quo.	Oppose	FFNZ opposes the requirement to reduce all contaminants everywhere and considers a tailored and proportionate approach ought to be adopted that focuses on management of contaminants (not reduction) and on critical source areas and MPA (as proposed in FFNZ's submission on Variation 1).
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-12538	Schedule 1	AMEND Schedule 1 to include the following: b. Clear and specific objectives for land use/ farm management that Farm Environment Plans can be assessed against; c. A clear requirement to calculate and include a Nitrogen Reference Point in the Farm Environment Plan.	Oppose	FFNZ considers that a new section regarding the purpose of a FEP needs to be inserted as set out in its submission on Variation 1 but it does not support adopting clear and specific objectives as this submitter proposes for reasons including that this will result in an inflexible approach (and flexibility is critical for farming) and is likely to impose significant cost for no net benefit. FFNZ also does not support a requirement to calculate and include a NRP in the FEP for reasons including that it does not support

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					the use of the NRP to allocate or grandparent nitrogen.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-12539	Schedule 1	AMEND Schedule 1 to include the following: a. Additional detail on irrigation management to identify irrigated areas on the property and/or a spatial risk map, and any soil moisture monitoring; d. Identification of any significant indigenous biodiversity, outstanding water bodies and sensitive receiving environments on or adjacent to the property.	Oppose	FFNZ considers there is no scope to include indigenous biodiversity and considers that the existing requirements in PC1 are too stringent and oppose significant cost for no net benefit (FFNZ refers to the FEP project it undertook and as referenced in its submission on Variation 1) and does not support changes to make these more stringent and inflexible.
Tongariro Taupo Conservation Board Submitter ID: 74060	PC1-4870	Schedule 1	RETAIN Schedule 1 stock exclusion from water bodies, setbacks and riparian planting. AND AMEND Schedule 1 (2)(a)(ii) so cattle, horses, deer and pigs are not able to be grazed on land over 25 degrees (this does not include small steep areas within a paddock) but exclude sheep, and horses that are being ridden or led.	Oppose	FFNZ is concerned that the proposed stock exclusion rules will impose significant costs for no net benefit as well as being impractical and uncertain. FFNZ does not support amendments to make the stock exclusion requirements more stringent or to base stock exclusion on slope. FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10592	Schedule 1	AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain... 1.c. A list of land parcels which...	Support in part	FFNZ agrees that the FEP ought to be able to be prepared on a property or farm enterprise basis.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</p> <p>iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u></p> <p>2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u>, and the priority of...</p> <p>a. A description of where and how...</p> <p>i. the <u>location and</u> provision of fencing and livestock...</p> <p>ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...</p> <p>c. A description of the critical source areas...</p> <p>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses from<u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u></p> <p>ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u></p>	Oppose in part	<p>FFNZ considers that it is likely to be too onerous to show the location of fencing and does not support this as a mandatory requirement.</p> <p>FFNZ is concerned that the requirement for an “opinion on material differences” is ambiguous, has the potential to create disputes and would likely impose significant cost.</p> <p>FFNZ is concerned that the proposed amendments to paragraphs 4, 5 and 6 are likely to be more stringent and impose significant cost for no net benefit. FFNZ opposes these amendments and considers that Schedule 1 ought to be amended as set out in its submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>f. A description of cultivation management...</p> <p>d. <u>Establishing and maintaining</u> appropriate buffers...</p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>a. The boundaries of the property <u>or enterprise (if different); and...</u></p> <p>4. A <u>detailed</u> description of the following: <u>Mitigation actions, timeframes and other measures to reduce the diffuse discharges of phosphorus, sediment and microbial pathogens that will be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time-bound actions will be undertaken, and when and to what standard they will be completed.</u></p> <p>5. A <u>detailed</u> description of the following: a. <u>Mitigation</u> actions, timeframes and other...</p> <p>6. A programme of works that sets out: a. <u>The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u> i. <u>Record of inspection by Waikato Regional Council staff or;</u> ii. <u>Record of inspection by Certified Industry Scheme staff; and</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>iii. <u>Record of audit by independent third party accredited auditor.</u></p> <p>7. <u>A version control table that sets out the date of any amendment to the Farm Environment Plan and the content of the amendment to the Farm Environment Plan.</u></p> <p>8. <u>A declaration from the Certified Farm Environment Planner confirming the best available and most accurate information was use for the promulgation and design of mitigation actions."</u></p>		
Waikato and Waipa Branches of the New Zealand Deer Farmers Association Submitter ID: 74008	PC1-9602	Schedule 1	<p>AMEND Schedule 1.A.2(a)(i) to read: "the provision of fencing and livestock crossing structures to achieve compliance with Schedule C; and..."</p> <p>AND AMEND Schedule 1 to allow slope thresholds to be practically assessed on-farm as guidelines with some margin for error of interpretation to account for within paddock slope variation.</p>	Support in part	<p>FFNZ considers that paragraph 2 ought to be deleted and re-worded as set out in its submission on Variation 1. FFNZ considers that Schedule C ought to be significantly amended as set out in its submission on Variation 1, and if this occurs then FFNZ considers it ought to refer to Schedule C. In the event that Schedule C is not amended, FFNZ agrees that it ought to be deleted.</p> <p>FFNZ is concerned that the proposal to base stock exclusion on slope has several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach based on stock units or a narrative description of when stock exclusion is required (see FFNZ's submission on Variation 1). In the event that such a n approach is not successful, FFNZ would support this submitter's proposal to allow slope thresholds to be practically assessed as guidelines.</p>
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3563	Schedule 1	<p>AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain...</p> <p>1.c. A list of land parcels which...</p>	Support in part	<p>FFNZ agrees that the FEP ought to be able to be prepared on a property or farm enterprise basis.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</p> <p>iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u></p> <p>2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u>, and the priority of...</p> <p>a. A description of where and how...</p> <p>i. the <u>location and</u> provision of fencing and livestock...</p> <p>ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...</p> <p>c. A description of the critical source areas...</p> <p>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses from<u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u></p> <p>ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u></p>	Oppose in part	<p>FFNZ considers that it is likely to be too onerous to show the location of fencing and does not support this as a mandatory requirement.</p> <p>FFNZ is concerned that the requirement for an “opinion on material differences” is ambiguous, has the potential to create disputes and would likely impose significant cost.</p> <p>FFNZ is concerned that the proposed amendments to paragraphs 4, 5 and 6 are likely to be more stringent and impose significant cost for no net benefit. FFNZ opposes these amendments and considers that Schedule 1 ought to be amended as set out in its submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>f. A description of cultivation management...</p> <p>d. <u>Establishing and maintaining</u> appropriate buffers...</p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>a. The boundaries of the property <u>or enterprise (if different); and...</u></p> <p>4. A <u>detailed</u> description of the following: <u>Mitigation actions, timeframes and other measures to reduce the diffuse discharges of phosphorus, sediment and microbial pathogens that will be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time-bound actions will be undertaken, and when and to what standard they will be completed.</u></p> <p>5. A <u>detailed</u> description of the following: a. <u>Mitigation</u> actions, timeframes and other...</p> <p>6. A programme of works that sets out: a. <u>The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u> i. <u>Record of inspection by Waikato Regional Council staff or;</u> ii. <u>Record of inspection by Certified Industry Scheme staff; and</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>iii. <u>Record of audit by independent third party accredited auditor.</u> 7. <u>A version control table that sets out the date of any amendment to the Farm Environment Plan and the content of the amendment to the Farm Environment Plan.</u> 8. <u>A declaration from the Certified Farm Environment Planner confirming the best available and most accurate information was use for the promulgation and design of mitigation actions."</u></p>		
<p>Waikato District Council (WDC) Submitter ID: 73418</p>	<p>PC1-3122</p>	<p>Schedule 1</p>	<p>REVIEW AND AMEND all relevant PPC1 provisions to: AMEND Schedule B to ensure it is explicit about how the Nitrogen Reference Point is to be used in rules applying for the first decade, and how it could be applied in future decades (additional Healthy River plan changes); AND CONSIDER the introduction of Nitrogen Emission Constraint (NEC) methodology as part of future plan changes at least, and; AND AMEND to provide greater clarity and alignment between statements concerning Nitrogen Reference Point in the rules and Schedule 1. The reason for this is the expectation is that Nitrogen Reference Point will increase in importance through time under Healthy Rivers plan changes (i.e.</p>	<p>Support in part Oppose in part</p>	<p>FFNZ agrees that the use of the NRP ought to be clarified. FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not support a NEC policy for reasons including that it is premature to pre-determine the approach or methodology for the next plan change when there are a lot of uncertainties and the purpose of the first 10 years is to better understand the catchment and effects activities and mitigations. FFNZ opposes allocation (see reasons in this document, FFNZ's submissions on PC1 and Variation 1). and an NEC approach would be a form of allocation.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			further reductions required), therefore it is important to get clarity now.		FFNZ considers that the clarity the submitter seeks about the relationship between the NRP, Rules and Schedule 1 ought to clarify that it does not grandparent properties nor is it used to inform an allocation approach nor has it been determined that an allocation approach will be adopted or necessary.
Waikato Environment Centre Submitter ID: 73436	PC1-6238	Schedule 1	AMEND Schedule 1 to provide for Farm Environment Plans to be a controlled activity. AND AMEND Schedule 1 to reduce the timeframes for a Farm Environment Plan to be put in place. AND AMEND to provide for monitoring of compliance to be undertaken by a truly independent party	Oppose	FFNZ considers that FEPs ought to be a permitted activity under the CIS or the simplified FEP for small discharges as proposed in FFNZ's submission on Variation 1. Therefore it does not support making them a controlled activity. FFNZ considers that the timeframes for preparing a FEP ought to be reasonable particularly in light of the volume and delay since notification of PC1. Therefore it opposes proposals to reduce the timeframes. FFNZ considers that a practical and pragmatic approach to monitoring is required to recognise the nature of farming and flexibility needed. FFNZ is concerned that the proposal for independent monitoring will increase costs of compliance and may result in an inappropriate approach to monitoring and compliance that may impose significant cost for no net benefit.
Waikato Focus on Peat Group Submitter ID: 72148	PC1-5523	Schedule 1	AMEND Schedule 1 (2)(b)(iii) to allow farmers to adjust setback distances as needed on a case-by-case basis as long as Farm Environment Plan outcomes are achieved AND AMEND PPC1 to recognise that managing peat soils requires different rules.	Support in part Oppose in part	FFNZ agrees that setbacks ought to be adjusted in FEPs. FFNZ supports reasonable minimum standards (e.g. 1m set backs) in PC1 with the ability in FEPs to consider alternative setbacks in response to assessments of critical source areas and applying FFNZ's MPA framework (see FFNZ's submission on Variation 1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					FFNZ considers that management of peat soils ought to be addressed through a tailored and proportionate FEP and applying the critical source area and MPA assessment proposed in FFNZ's submission on Variation 1.
Waikato Groundspread Association Submitter ID: 67970	PC1-31	Schedule 1	<p>AMEND Schedule 1/PPC1 so that approved Quality Assurance schemes and best practice technology be included in the Farm Environmental Plans as mitigation tools for the application of fertiliser and plant nutrients</p> <p>AND AMEND so that all fertiliser and nutrients applied to farms within the catchment of the PPC1 should be applied in a manner that meets the requirements of the Fertiliser Code of Practice – Fertmark Spreadmark and be supported by the use of technology that capture the areas that fertiliser and nutrients are applied to (Proof of Placement)</p> <p>AND AMEND so that the standard of Quality Assurance to meet PPC1 can also be met by Quality Assurance programs or equivalent that meet the requirements of the Fertiliser Codes of Practice</p> <p>AND AMEND so that the requirements of the standard of Quality Assurance must be met by all participants including Groundspread operators (fertiliser application) and farmers</p> <p>AND AMEND so that technology is required to support the application of</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>In principle, FFNZ supports the consideration of the factors proposed by this submitter as part of the FEP process. However, FFNZ is concerned that a requirement to adopt Quality Assurance schemes, best practice technology and Fertiliser Code of Practice, for example, may not provide for sufficient tailoring to the particular characteristics of the farm enterprise or sub-catchment and may result in significant cost for no net benefit.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			fertiliser and plant nutrients to land that is covered by the identified areas with PPC1.		
Waikato Regional Council Submitter ID: 72890	PC1-3575	Schedule 1	<p>DELETE Schedule 1 references to the 5 year rolling average and instead measure compliance based on whether the proposed mitigation actions listed in a Farm Environment Plans are completed.</p> <p>AND AMEND Schedule 1 clause 2 (e) to read: "A description of nutrient management practices including... using the model OVERSEER® in accordance with the OVERSEER® <u>data input standards and Table 1: Schedule Base protocols</u> , or using any other model or method approved"</p> <p>AND AMEND Schedule 1: Vegetable growing minimum standards Row 5 of the table Soil/Phosphorus to read: "As a minimum by block: an approved <u>erosion and sediment control plan constructed/compiled by the Certified Farm Environment Planner</u> in accordance with the Erosion and Sediment Control Guidelines for Vegetable Production June 2014"</p> <p>AND AMEND Schedule 1 clause 5(a) to read: "Actions, timeframes and other measures.... or enterprise's Nitrogen Reference Point unless other suitable mitigations are specified."</p> <p>OR AMEND 3.11.5.4(iii) and Schedule 1 to provide more clarity</p>	Oppose in part	<p>FFNZ supports the five year rolling average for reasons including that it provides for reasonable anomalies and spikes e.g. drought one year raising nitrogen (see FFNZ's submission on Variation 1). Therefore FFNZ does not support the proposal to remove the five year rolling average.</p> <p>FFNZ has concerns about monitoring and compliance on the basis of detailed actions in FEPs for reasons including that reasonable flexibility needs to be provided to recognise that farming involves reacting to unexpected or unanticipated events or changes (e.g. economic downturn, climatic events etc). FFNZ considers that monitoring should be reasonable and should not result in micromanagement (see FFNZ's submission on Variation 1).</p> <p>In respect of the proposed amendments to paragraph (e) FFNZ considers that reasonable flexibility needs to be provided to adjust data input standards as explained in FFNZ's submission on Variation 1.</p> <p>FFNZ would agree with the proposed amendments to the vegetable growing minimum standards as long as they were reasonable and no more stringent or inflexible than those proposed.</p> <p>FFNZ considers that clause 3.11.5.4(iii) ought to be deleted and Council should not have control or discretion over the content of FEPs or timing of actions if they are prepared by a certified farm</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			regarding how the discretion available in this provision, should be exercised.		environment planner who has the required skills, knowledge and expertise (see FFNZ's submission on Variation 1).
Waikato Regional Council Submitter ID: 72890	PC1-12544	Schedule 1	<p>AMEND Schedule 1 to simplify the numbering AND AMEND to reflect the standards/terms/conditions in the rules OR DELETE the references to some of the minimum standards in Schedule 1 OR AMEND to reflect the standards as 'best management practice' recommendations rather than firm requirements AND AMEND to renumber Schedule 1 clause "2(f)(ii)(e)" to clause "<u>2(g)</u>" AND AMEND to renumber clause "2(f)(ii)(f)" to clause "<u>2(h)</u>" AND AMEND Schedule 1 clause 4 to read: "A description of the actions... (having regard to their relative priority and to the need for proportionality as specified in Policy 2(d) and 3(g)) as well as where the mandatory..." AND AMEND Schedule 1 clause 2(b)(ii) to read: "Where practicable the provision... for land with a slope of less less than 15°..."</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees the numbering could be simplified.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards (then references to minimum standards in rules and Schedule 1 could be streamlined and/or deleted as this submitter proposes). FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.</p> <p>In principle FFNZ agrees that any standards ought to be 'best management practice' recommendations rather than firm requirements but to avoid confusion they could be referred to as guidance. This is because FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that proportionality ought to be considered and supports the amendment to refer to this in clause 4.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Waikato Regional Council Submitter ID: 72890	PC1-12545	Schedule 1	AMEND Schedule 1 clause 2(f)(i) to read: "The identification of slopes over... from that cultivation can be avoided <u>minimised</u> ; and" AND AMEND Schedule 1 Clause 2(f)(ii)(d) to read: "maintaining appropriate buffers between cultivated areas and water bodies (minimum 5m setback <u>or a lesser distance greater than 1m with appropriate mitigation measures specified in the Farm Environment Plan</u>)." AND AMEND Schedule 1 clause 2(f)(ii)(f) to read: "A description of freshwater... to groundwater or surface water will be minimised. <u>This description shall, unless otherwise authorised by a resource consent, include information that demonstrates compliance with conditions (a) to (f) of rule 3.4.5.6 of the Waikato Regional Plan.</u> "	Support in part Oppose in part	FFNZ agrees that clause 2(f)(i) ought to delete the reference to "avoid". However it considers "minimise" is too high a standard and ought to instead be "managed." FFNZ considers that the setbacks ought to be 1m not 5m (see FFNZ's submission on Variation 1). In the alternative, and event that submission is not successful, FFNZ would support the proposal to amend the wording in paragraph 2(f)(ii)(d) as proposed. FFNZ considers that paragraph 2(f)(ii)(f) ought to be deleted because this does not relate to cultivation above 25 degrees and ought to be moved to the critical source area assessment (see FFNZ's submission on Variation 1). FFNZ would support the cross reference to rule 3.4.5.6 as long as that resulted in an approach that was no more stringent than the current application of the regional plan.
Waikato River Authority Submitter ID: 74033	PC1-11563	Schedule 1	AMEND Schedule 1 to include a requirement for Farm Environment Plan actions related to the four contaminants to be implemented within a specified timeframe AND AMEND to strengthen the implementation aspects of Farm Environment Plans, especially in relation to the management of contaminants other than nitrogen so that there is a transparent process that ensures accountability and compliance with such plans.	Oppose in part	In principle, FFNZ supports an approach that is consistent across all four contaminants. However, it does not support a reference point type approach for all contaminants or making timeframes more stringent or adopting a blanket approach. FFNZ considers there need to be reasonable timeframes and sufficient tailoring of mitigations. FFNZ considers that a practical and pragmatic approach to monitoring is required to recognise the nature of farming and flexibility needed (see FFNZ's submission on Variation 1). FFNZ is concerned that the proposal for independent monitoring will

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					increase costs of compliance and may result in an inappropriate approach to monitoring and compliance that may impose significant cost for no net benefit.
Waipa District Council Submitter ID: 67704	PC1-3243	Schedule 1	AMEND Schedule 1 requirements to remove reference to 'appropriate' and other subjective provisions and replace them with specific measurable language, OR AMEND the Farm Environment Plan provisions so that they inform mitigation measures that must be complied with, rather than set the standards themselves. AND REMOVE the reference to alternative nutrient budget models.	Support in part Oppose in part	While FFNZ agrees in principle that any subjectivity ought to be minimised, FFNZ considers that it is not appropriate or practical to adopt "black and white" standards as flexibility is needed to tailor FEPs to the particularly farm enterprise and sub-catchment. FFNZ supports flexibility to adopt alternative models and therefore opposes the deletion of the reference to alternative nutrient budget models.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11389	Schedule 1	AMEND Schedule 1(2)(e) to read: "A description of nutrient management practices including a nutrient budget for the farm enterprise calculated using either the model-current version of the OVERSEER or the APSIM or the SPASMO Model in accordance with the OVERSEER-relevant use protocols, or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council. " AND AMEND Schedule 1(5)(a) to read: "Actions, timeframes and other measures...as determined by the use of either the current version of the OVERSEER or the APSIM or the SPASMO Model , does not increase beyond the property or enterprise's Nitrogen Reference Point as	Support in part Oppose in part	FFNZ supports Overseer as a on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). Therefore it agrees with changes to refer to APSIM or SPASMO but considers that the ability to use other models needs to be provided for so does not agree to the deletion of the words beginning "(or any other model ..." In the absence of modelling or information to substantiate the impacts of the proposal to include currently planned or consented future land use, or an assessment of how that would be assessed and applied, FFNZ does not support the proposal.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>calculated in accordance with paragraph (f) of Schedule B), unless other suitable mitigations are specified; or"</u>		
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-12546	Schedule 1	AMEND Schedule 1 to consistently refer to a 'property or enterprise' throughout AND AMEND all references to 'Certified Industry Schemes' to read " <u>any relevant Certified Industry Scheme</u> ".	Support in part	FFNZ agrees that there ought to be the option to manage farms at a property or enterprise level. FFNZ agrees with the amendment to "any relevant" CIS provided that the CIS option is retained. FFNZ does not agree with this submitter's proposal to remove reference to CIS until they are developed then amend the plan change.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-12547	Schedule 1	ADD a NEW Schedule 1(6) to read: " <u>Farm Environment Plans will be subject to review within the period of 6 months following the preparation of any relevant Sub-catchment management plan pertaining to a property or enterprise to ensure that Farm Environment Plans are not inconsistent with relevant Sub-catchment management plans.</u> "	Oppose	FFNZ does not support this submitter's sub-catchment collective proposal for reasons including this is likely to involve allocation (FFNZ does not support allocation), potentially gives significant power to catchment collectives, the potential for abuse of that power and the potential significant cost. FFNZ is also concerned about the waste in cost and uncertainty for farmers if FEPs have to be reviewed. FFNZ considers this can be addressed by its proposal for Catchment Profiles to be prepared and FEPs to be based on MPA (see FFNZ's submission on Variation 1).
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2148	Schedule 1	DELETE reference to the 75th percentile nitrogen leaching value. AND DELETE reference to land capability from Schedule 1(2)(d).	Support in part Oppose in part	FFNZ considers that the 75 th percentile ought to be retained but only if the amendments set out in its submission on Variation 1 are made (including a reasonable consenting pathway for those in the 75 th percentile and recognition of geophysical differences). If those are not made FFNZ would agree with the proposal to delete the 75 th percentile. FFN considers that paragraph 2(d) ought to be deleted and considers that there should be no reference to LUS or capability in PC1. Therefore

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					FFNZ agrees to the proposed deletion of "land capability."
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-12548	Schedule 1	Schedule 1 - ADD a clause to ensure that Waikato Regional Council will provide Best Managements Practice guidelines for actions or measures to mitigate contaminant discharge in relation to a range of land uses, stock policies, land types and other biophysical factors and that such mitigating actions or measures are to be included in Farm Environment Plans and implemented on all properties across the region.	Oppose in part	FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1). Therefore, FFNZ does not support adopting a clause in Schedule 1 regarding BMP.
Waitomo Catchment Trust Board Submitter ID: 73124	PC1-7943	Schedule 1	AMEND Schedule 1 so that Nitrogen Reference Points are calculated as part of the Farm Environment Plan, at a property or sub-catchment level. AND if the Nitrogen Reference Point is to be calculated as a percentile, it should be based on a 5-year average.	Support in part Oppose in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as an on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). FFNZ supports calculating it as part of the FEP (as long as FFNZ concerns about monitoring and enforcement set out in this document and in FFNZ's submission on Variation 1 are addressed) and supports a five year rolling average.
Waitomo Catchment Trust Board Submitter ID: 73124	PC1-12551	Schedule 1	AMEND Schedule 1 to ensure collaboration between Waikato Regional Council and landowners in developing Farm Environment Plans, and that Farm Environment Plans are a free or subsidised service.	Support in part	FFNZ agrees that there needs to be collaboration and that there ought to be subsidies, funding or assistance with the cost of preparing FEPs.

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Waitomo District Council Submitter ID: 73688	PC1-10856	Schedule 1	AMEND Schedule 1 requirements to remove reference to 'appropriate' and other subjective provisions and replace them with specific measurable language OR AMEND the Farm Environment Plan provisions so that they inform mitigation measures that must be complied with, rather than set the standards themselves.	Support in part Oppose in part	While FFNZ agrees in principle that any subjectivity ought to be minimised, FFNZ considers that it is not appropriate or practical to adopt "black and white" standards as flexibility is needed to tailor FEPs to the particularly farm enterprise and sub-catchment. FFNZ considers that monitoring and enforcement of mitigation measures needs to be pragmatic, not involve micromanagement and recognise the nature of farming including that flexibility is required to respond to unforeseeable or unexpected events including climatic and economic events.
Waitomo District Council Submitter ID: 73688	PC1-12552	Schedule 1	AMEND Schedule 1 to ensure appropriate account has been taken in setting the E.coli limits to make allowance for peak flooding events.	Support in part	FFNZ does not support the 80 year numeric targets. FFNZ agrees that targets for E coli need to reasonably account and provide for spikes and uncontrollable events like flooding.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10808	Schedule 2	AMEND Schedule 2 to read: "Assessment Criteria A. Certified Industry Scheme System The application must demonstrate that the Certified Industry Scheme: 1. Is consistent with and will achieve: ... c. the requirements of Rules 3.11.5.3 and 3.11.5.5; and d. <u>the contaminant reductions that are required for the sub-catchment/s where the Certified Industry Scheme operates through the coordination of Farm Management Plans managed by the Certified Industry Scheme.</u> 3 5. Has documented systems, processes, and procedures to ensure:	Support in part Oppose in part	FFNZ does not support the 80 year numeric targets or the adoption of an allocation approach or an approach that enables collectives (or other bodies) to allocate or require reductions. FFNZ supports the use of FEPs to tailor mitigations to the farm enterprise and sub-catchment as set out in its submission on Variation 1. It is concerned that the proposed amendment to paragraph 1(d) blurs the boundary between these two things and appears to be an allocation approach and therefore FFNZ does not support it. In principle, FFNZ agrees with an approach where there are agreed process for non compliance and accountability and enforcement of responsibilities as proposed in paragraphs g, h and i. However, FFNZ has concerns about how this will be implemented

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			<p>g. <u>Agreed process for non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including Revocation of the member from the Certified Industry Scheme.</u></p> <p>h. <u>Internal quality control and verification</u></p> <p>i. <u>The responsibilities and accountability of all parties to Certified Industry Scheme are clearly stated and enforced.</u></p> <p>B. People The application must demonstrate that:</p> <p>1. <u>Those The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. <u>Auditing of Farm Environment plan requirements is undertaken by parties that are accredited auditors and independent of the Farm Environment Plan preparation and approval."</u></p>		<p>and applied and therefore cannot agree until further clarity is provided.</p> <p>In principle FFNZ considers the clarifications to paragraphs B1 and are helpful but cannot agree until they are understood including the practical implications.</p>
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10654	Schedule 2	<p>AMEND Schedule 2(A)(1) to read: "Is consistent with <u>standards necessary for the professional consultancy services and auditing services to support:...</u>"</p> <p>AND DELETE Schedule 2(C) OR AMEND Schedule 2(C) to ensure the application is able to demonstrate that Farm Environment Plans can be</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>In principle, FFNZ would support the amendment to ensure that appropriate standards and consistency (both between schemes and between schemes and the rules) are adopted.</p> <p>FFNZ considers that section C is important to ensure that FEPs are consistent whether they are prepared under the CIS or rules and therefore does not agree to delete this.</p>

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Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10561	Schedule 2	<p>prepared and/or assessed for their conformance with Schedule 1.</p> <p>AMEND Schedule 2 to read: "The purpose of this schedule is to set out the criteria against which applications to approve an industry scheme will be assessed <u>standards that will apply to Certified Industry Scheme and which will be used as a basis for certification.</u> The application <u>for certification</u> shall be lodged... <u>Assessment Criteria Standards</u> ...f. <u>That those registered to a Certified Industry Scheme are aware of any non-compliance and, if not remedied, and non-compliance is reported to Corrective Actions will be implemented and escalated where required, including escalation to Waikato Regional Council in the approved format. If internal escalation is not successful...</u> B. People The application must demonstrate that: 1. Those generating and auditing preparing <u>preparing Farm Environment Plans and auditing implementation of Farm Environment Plans</u> are suitably qualified and experienced. 2. Auditing of Farm Environment plan requirements is independent of the Farm Environment Plan preparation and approval.</p>	Support in part	FFNZ supports the amendments to the extent that they ensure reasonable standards and conditions are applied to the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>2. The Certified Industry Scheme has access to Certified Farm Nutrient Advisors to prepare Nitrogen Reference Points and sufficient Certified Farm Environment Planners to certify Farm Environment Plans.</u></p> <p>C. Farm Environment Plans The application must demonstrate that how Farm Environment Plans are <u>will be</u> prepared in conformance with Schedule 1.</p> <p><u>An industry scheme will not be certified until the Chief Executive Officer of the Waikato Regional Council determines that the above standards have been met."</u></p>		
Fulton Hogan Limited Submitter ID: 74048	PC1-10881	Schedule 2	AMEND Schedule 2(A)(1)(a) to read: "a. the achievement of the water quality or targets referred to in Objective 3; and..."	Support in part	FFNZ does not support the 80 year numeric targets and seeks amendments to Objective 3. FFNZ agrees with the proposed amendment on the basis that Objective 3 is also amended as set out in FFNZ's submission on Variation 1.
GBC Winstone Submitter ID: 73992	PC1-3625	Schedule 2	AMEND Schedule 2 A. 1.a. as follows: "the achievement of the water quality or targets referred to in Objective 3; and"	Support in part	FFNZ does not support the 80 year numeric targets and seeks amendments to Objective 3. FFNZ agrees with the proposed amendment on the basis that Objective 3 is also amended as set out in FFNZ's submission on Variation 1.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5792	Schedule 2	DELETE Schedule 2.	Oppose	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore FFNZ considers Schedule 2 ought to be retained.
Horticulture New Zealand (HortNZ)	PC1-10224	Schedule 2	The application must demonstrate that the Certified Industry Scheme: "1. Is consistent with:	Oppose in part	FFNZ considers that paragraph 1 ought to be retained and amended as set out in its submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73801			<p>a) the achievement of the water quality targets referred to in Objective 3; and b) the purposes of Policy 2 or 3; and c) the requirements of Rules 3.11.5.3 and 3.11.5.5.</p> <p>21. Has an appropriate ownership structure, governance arrangements and management.</p> <p>32. Has documented systems, processes, and procedures to ensure:</p> <p><u>a) Competency assessment and checks for people who generate and subsequently monitor Farm Environment Plans in line with the relevant industry qualifications as agreed with Waikato Regional Council</u></p> <p>ab) Competent and consistent performance in Farm Environment Plan preparation and audit.</p> <p>bc) Effective internal monitoring of performance.</p> <p>cd) Robust data management.</p> <p>de) Timely provision of suitable quality data to Waikato Regional Council.</p> <p>ef) Timely and appropriate reporting.</p> <p>fg) Corrective actions will be implemented and escalated where required, including escalation to Waikato Regional Council if internal escalation is not successful.</p> <p>gh) Internal quality control.</p> <p>hi) The responsibilities of all parties to</p>		<p>In principle FFNZ agrees that appropriate procedures to ensure competency ought to be adopted but considers that further thought needs to be given to monitoring and compliance i.e. whether it will be done by the CIS and to ensure no micromanagement and a pragmatic approach to monitoring and compliance.</p> <p>FFNZ considers section B ought to be retained and refers to its submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>the Certified Industry Scheme are clearly stated.</p> <p>ij) An accurate and up to date register of scheme membership is maintained.</p> <p>jk) Transparency and public accountability of Certified Industry Schemes</p> <p>kl) The articles of the scheme are available for public viewing.</p> <p>B. People The application must demonstrate that:</p> <p>1. Those generating and auditing Farm Environment Plans are suitably qualified and experienced.</p> <p>2. Auditing of Farm Environment Plan requirements is independent of the Farm Environment Plan preparation and approval.</p> <p>C. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1 or 1B."</p>		
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4473	Schedule 2	AMEND PPC1 to protect remaining wetlands and gully seeps and create new incentives to encourage the creation or reinstatement of wetland areas AND RETAIN Schedule 2.	Oppose in part	<p>FFNZ does not support a blanket approach to protecting all wetlands and gullies for reasons including that it is likely to impose significant cost for no net benefit. FFNZ instead supports a tailored and proportionate approach that considers critical source areas, sub-catchment characteristics and the resources reasonably available.</p> <p>FFNZ considers that Schedule 2 ought to be retained but amended as set out in its submission on Variation 1.</p>

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Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9367	Schedule 2	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System The application must <u>clearly demonstrate that the...</u> a. the achievement ofthe water quality targets referred to... c. the requirements of Rules 3.11.5.3 and 3.11.5.5; and d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u> 2. Has an appropriate ownership structure, governance arrangements and management <u>(including capacity and capability to undertake the coordinated management of Farm Management Plans.</u> 3. <u>Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u> 4. <u>Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u> 35. Has documented systems, processes, and...</p>	Oppose in part	<p>FFNZ does not support the 80 year numeric targets or the adoption of an allocation approach or an approach that enables collectives (or other bodies) to allocate or require reductions. FFNZ supports the use of FEPs the tailor mitigations to the farm enterprise and sub-catchment as set out in its submission on Variation 1. Therefore FFNZ does not agree to the amendments to paragraphs 1(a) and (d) , and the new paragraph 4 and considers they ought to be deleted.</p> <p>FFNZ considers that reasonable standards and conditions are applied to the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules). However, FFNZ considers that the proposed amendments go beyond this and does not support them.</p> <p>In principle FFNZ agrees that appropriate procedures to ensure competency ought to be adopted but considers that further thought needs to be given to monitoring and compliance i.e. whether it will be done by the CIS and to ensure no micromangement and a pragmatic approach to monitoring and compliance. However, FFNZ considers that the proposed amendments go beyond this and does not support them.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>a. Competent and consistent performance in <u>preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p> <p>b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. Robust data management <u>(both spatial and temporal)...</u></p> <p>d. ...</p> <p>e. Timely and appropriate <u>detailed reporting, including (but not limited to):</u></p> <p>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p> <p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. <u>Internal quality control and verification.</u></p> <p>i. <u>The responsibilities and accountability of all parties to the Certified Industry Scheme are clearly stated and enforced...</u></p> <p>j. <u>An accurate and up to date register of scheme membership is established and maintained ...</u></p> <p>k. ...</p> <p>l. <u>The articles of the scheme, including its register of membership are available for public viewing.</u></p> <p>B. People The application must demonstrate...</p> <p>1. These<u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. <u>Auditing of Farm Environment Plans - prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors and independent of the Farm...</u></p> <p>c. <u>Farm Environment Plans</u> The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1." Or</p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.		
Mercury NZ Limited Submitter ID: 73182	PC1-9678	Schedule 2	AMEND Schedule 2 to read: "Schedule 2 - Certification of <u>Industry Sector</u> Schemes The purpose of this schedule is to set out the criteria against which applications to approve an industry sector scheme will be assessed. Assessment Criteria A. Certified <u>Industry Sector</u> Scheme System The application must demonstrate that the Certified <u>Industry Sector</u> Scheme: 3. Has documented systems, processes, and procedures to ensure: h. The responsibilities of all parties to the Certified <u>Industry Sector</u> Scheme are clearly stated. j. Transparency and public accountability of Certified <u>Industry Sector</u> Schemes."	Support in part	In principle, FFNZ supports the CIS as a alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. If the scheme or proposal could have a more appropriate title or name, FFNZ would support that. FFNZ considers that using the word "sector" may be helpful to suggest that the scope is wider than just "industry" but is not sure that "sector" is the right word e.g. the schemes may include several farming sectors and may no be set up on a sector by sector basis (and it may be appropriate to provide flexibility for such an approach).
Miraka Limited Submitter ID: 73492	PC1-8899	Schedule 2	RETAIN Schedule 2.	Support in part	FFNZ considers that Schedule 2 and the CIS process ought to be retained but considers that it would appropriate to amend it as set out in FFNZ's submission on Variation 1.

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New Zealand Pork Industry Board Submitter ID: 73780	PC1-4671	Schedule 2	AMEND Schedule 2 to read: "3(a) Competent and consistent performance in Farm Environment Plan preparation and audit... (g) Internal quality control <u>based on the principles of the current version of ISO 17065...</u> <u>(l) Conflict of interest is identified prior to Farm Environment Plan audits and mitigated as guided by ISO 17065.</u> <u>(m) Audits are conducted following the principles outlined in the current version of ISO 19011."</u>	Support in part Oppose in part	FFNZ considers that the word "preparation" ought to remain because there ought to be competent and consistent preparation of FEPs by certified FEPs to ensure the FEPs prepared under the CIS are just as robust as FEPs prepared under any of the rules. In principle, FFNZ supports audit and quality control and basing this in verifiable and certain standards. However, it is not sure that locking a specific ISO into a plan change is an appropriate approach as it does not provide for flexibility as standards change as it is difficult to amend a plan. Therefore FFNZ does not support the specific amendments to paragraphs g, l and m.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11868	Schedule 2	AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System The application must <u>clearly</u> demonstrate that the... a. the achievement of the water quality targets referred to... c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u> d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u> 2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u>	Oppose in part	FFNZ does not support the 80 year numeric targets or the adoption of an allocation approach or an approach that enables collectives (or other bodies) to allocate or require reductions. FFNZ supports the use of FEPs the tailor mitigations to the farm enterprise and sub-catchment as set out in its submission on Variation 1. Therefore FFNZ does not agree to the amendments to paragraphs 1(a) and (d) , and the new paragraph 4 and considers they ought to be deleted. FFNZ considers that reasonable standards and conditions are applied to the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules). However, FFNZ considers that the proposed amendments go beyond this and does not support them. In principle FFNZ agrees that appropriate procedures to ensure competency ought to be adopted but considers that further thought needs to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>3. Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p><u>4. Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p><u>35. Has documented systems, processes, and...</u></p> <p>a. <u>Competent and consistent performance in preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p> <p>b. <u>Effective internal monitoring of performance, including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. <u>Robust data management (both spatial and temporal)...</u></p> <p>d. ...</p> <p>e. <u>Timely and appropriate detailed reporting, including (but not limited to):</u></p> <p>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p>		<p>be given to monitoring and compliance i.e. whether it will be done by the CIS and to ensure no micromanagement and a pragmatic approach to monitoring and compliance. However, FFNZ considers that the proposed amendments go beyond this and does not support them.</p> <p>In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore it does not support the proposal to make FEPs a controlled activity.</p>

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			<p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p> <p>f. <u>Corrective actions will be implemented where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. <u>Internal quality control and verification.</u></p> <p>i. <u>The responsibilities and accountability of all parties to the Certified Industry Scheme are clearly stated and enforced...</u></p> <p>j. <u>An accurate and up to date register of scheme membership is established and maintained ...</u></p> <p>k. ...</p> <p>l. <u>The articles of the scheme, including its register of membership are available for public viewing.</u></p> <p>B. People The application must demonstrate...</p> <p>1. These<u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Planners suitably qualified and experienced.</p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors and independent of the Farm...</u></p> <p>c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1."</p> <p>Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>		
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8826	Schedule 2	<p>AMEND Schedule 2 by incorporating it into the proposed New Restricted discretionary Activity - approval of certified scheme [Rule 8 in Table 2 of the submission].</p> <p>AND DELETE the following sentence from Schedule 2: "Approval will be at the discretion of the Chief Executive Officer of the Waikato Regional Council subject to the Chief Executive Officer being satisfied that the scheme will effectively deliver on the assessment criteria."</p>	Oppose in part	<p>FFNZ opposes this submitter's proposal to provide for an RDA and therefore opposes the proposed amendment to Schedule 2 to incorporate it into the proposed RDA.</p> <p>FFNZ considers that the sentence this submitter proposes to delete ought to be retained.</p> <p>In principle, FFNZ supports amendments to ensure the CIS is intra vires, robust and to ensure that FEPs prepared in accordance with it are robust and consistent (both between schemes and between schemes and the rules).</p>

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			<p>AND OR AMEND to make such changes as appropriate to reflect the reasons for the submission including: ENSURE that Certified Industry Schemes are functional by 2019. AND AMEND to approval a Certified Industry Scheme approved by the CEO so that Schedule 2 is not ultra vires, there is transparency that the scheme will be comprehensive and robust.</p> <p>AND AMEND to remove the reliance on the OVERSEER Model is as the basis for certification.</p> <p>AND OR AMEND to the alternative approach proposed in the submission.</p>		
<p>Raukawa Charitable Trust Submitter ID: 74073</p>	<p>PC1-10606</p>	<p>Schedule 2</p>	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System The application must <u>clearly</u> demonstrate that the...</p> <p>a. the achievement ofthe water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u></p> <p>d. the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</p> <p>2. Has an appropriate ownership structure, governance arrangements and management (including capacity</p>	<p>Oppose in part</p>	<p>FFNZ does not support the 80 year numeric targets or the adoption of an allocation approach or an approach that enables collectives (or other bodies) to allocate or require reductions. FFNZ supports the use of FEPs the tailor mitigations to the farm enterprise and sub-catchment as set out in its submission on Variation 1. Therefore FFNZ does not agree to the amendments to paragraphs 1(a) and (d) , and the new paragraph 4 and considers they ought to be deleted.</p> <p>FFNZ considers that reasonable standards and conditions are applied to the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules). However, FFNZ considers that the proposed amendments go beyond this and does not support them.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p><u>3. Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p><u>4. Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p><u>35. Has documented systems, processes, and...</u></p> <p>a. Competent and consistent performance in <u>preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p> <p>b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. Robust data management (<u>both spatial and temporal</u>)...</p> <p>d. ...</p> <p>e. Timely and <u>appropriate detailed reporting, including (but not limited to):</u></p>		<p>In principle FFNZ agrees that appropriate procedures to ensure competency ought to be adopted but considers that further thought needs to be given to monitoring and compliance i.e. whether it will be done by the CIS and to ensure no micromanagement and a pragmatic approach to monitoring and compliance. However, FFNZ considers that the proposed amendments go beyond this and does not support them.</p> <p>In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore it does not support the proposal to make FEPs a controlled activity.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p> <p>f. <u>Corrective actions will be implemented where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. <u>Internal quality control and verification.</u></p> <p>i. <u>The responsibilities and accountability of all parties to the Certified Industry Scheme are clearly stated and enforced...</u></p> <p>j. <u>An accurate and up to date register of scheme membership is established and maintained ...</u></p> <p>k. ...</p> <p>l. <u>The articles of the scheme, including its register of membership are available for public viewing.</u></p> <p>B. People The application must demonstrate...</p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>1. TheseThe nominated parties responsible for generating and auditing Farm Environment Plans are <u>Certified Farm Environment Planners</u> suitably qualified and experienced.</p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors</u> and independent of the Farm...</p> <p>c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1."</p> <p>Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>		
Ravensdown Limited Submitter ID: 74058	PC1-10183	Schedule 2	<p>RETAIN Schedule 2. AND AMEND as follows: "Assessment Criteria A. Certified Industry Scheme System The application must demonstrate that the Certified Industry Scheme:</p> <ol style="list-style-type: none"> 1. Is consistent with <u>standards necessary for the professional consultancy services and auditing services to support:</u>" 	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ considers that Schedule 2 and the CIS process ought to be retained but considers that it would appropriate to amend it as set out in FFNZ's submission on Variation 1.</p> <p>In principle, FFNZ agrees that there is a need to ensure consistency (both between schemes and between schemes and the rules). It would support the amendment to paragraph 1 provided that it was reasonable and consistent.</p>

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			AND AMEND as follows: “C. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1.”		FFNZ opposes the deletion of paragraph C because it considers this is necessary to ensure consistency in FEPs.
Save Lake Karapiro Inc Submitter ID: 72459	PC1-5745	Schedule 2	Schedule 2: DELETE the use of industry self-management schemes.	Oppose	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore it considers Schedule 2 ought to be retained but amended as set out in its submission on Variation 1.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11197	Schedule 2	AMEND PPC1 to include better and further particulars regarding the approval and operation of Certified Industry Schemes.	Support in part	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. FFNZ also supports amendments to ensure that reasonable standards and conditions are applied to the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules).
Stark, Steven and Theresa Submitter ID: 73721	PC1-5236	Schedule 2	AMEND Schedule 2 by replacing all water quality targets with the minimum standards for stock exclusion as set out in the Ministry for the Environment's Clean Water document published February 2017, publication number ME 1293; and within the National Objectives Framework in the National Policy	Support in part Oppose in part	FFNZ does not support the numeric 80 year targets and considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is

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			Statement for Freshwater Management 2014. AND AMEND by allowing movement of water quality within a band. AND AMEND Schedule 2 to read: "1.b) the purposes of Policy 2 or 3; Measure and monitor for the first 10 years."		something that ought to be considered as part of a FEP and tailored to the particular situation. FFNZ agrees that movement within a NOF band ought to be provided for as part of maintain or improve and refers to its submission on Variation 1. FFNZ does not support the amendment to paragraph 1(b) because it is concerned that measuring and monitoring may be used to allocate and because it considers that measuring will not be easily achievable and should not be undertaken on a property basis.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9339	Schedule 2	ADD to Schedule 2 a qualification to the Certified Farm Environment Planner and Certified Farm Nutrient Advisor requirements that allows the operator of an enterprise or property to take the role of the Certified Farm Environment Planner and Certified Farm Nutrient Advisor for that enterprise or property.	Oppose in part	FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property. Having said this, FFNZ agrees that the land owner needs to be involved in the preparation of the FEP and needs flexibility to choose a suitable CFEP. In the event that Council retains control then FFNZ would agree in principle that the option for farmer preparation of FEPs ought to be provided for.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11818	Schedule 2	AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System The application must <u>clearly</u> demonstrate that the...	Oppose in part	FFNZ does not support the 80 year numeric targets or the adoption of an allocation approach or an approach that enables collectives (or other bodies) to allocate or require reductions. FFNZ supports the use of FEPs the tailor mitigations to the farm enterprise and sub-catchment as set out in its

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			<p>a. the achievement ofthe water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u></p> <p>d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></p> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. <u>Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p>4. <u>Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p>35. Has documented systems, processes, and...</p> <p>a. Competent and consistent performance in <u>preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p>		<p>submission on Variation 1. Therefore FFNZ does not agree to the amendments to paragraphs 1(a) and (d) , and the new paragraph 4 and considers they ought to be deleted.</p> <p>FFNZ considers that reasonable standards and conditions are applied to the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules). However, FFNZ considers that the proposed amendments go beyond this and does not support them.</p> <p>In principle FFNZ agrees that appropriate procedures to ensure competency ought to be adopted but considers that further thought needs to be given to monitoring and compliance i.e. whether it will be done by the CIS and to ensure no micromanagement and a pragmatic approach to monitoring and compliance. However, FFNZ considers that the proposed amendments go beyond this and does not support them.</p> <p>In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore it does not support the proposal to make FEPs a controlled activity.</p>

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			<p>b. <u>Effective internal monitoring of performance, including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. <u>Robust data management (both spatial and temporal),...</u></p> <p>d. ...</p> <p>e. <u>Timely and appropriate detailed reporting, including (but not limited to):</u></p> <p>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p> <p>f. <u>Corrective actions will be implemented where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. <u>Internal quality control and verification.</u></p>		

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			<p>i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced</u>...</p> <p>j. An accurate and up to date register of scheme membership is <u>established and maintained</u> ...</p> <p>k. ...</p> <p>l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p> <p>B. People The application must demonstrate...</p> <p>1. These <u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners</u> suitably qualified and experienced.</p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors</u> and independent of the Farm...</p> <p>c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1." Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity</p>		

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			subject to the assessment criteria in Schedule 2.		
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8205	Schedule 2	DELETE all reference to Certified Industry Schemes from PPC1.	Oppose	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore FFNZ does not agree that references to the CIS ought to be deleted.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10620	Schedule 2	AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System The application must <u>clearly demonstrate that the...</u> a. the achievement of the water quality targets referred to... c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u> d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u> 2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u> 3. <u>Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the</u>	Oppose in part	FFNZ does not support the 80 year numeric targets or the adoption of an allocation approach or an approach that enables collectives (or other bodies) to allocate or require reductions. FFNZ supports the use of FEPs the tailor mitigations to the farm enterprise and sub-catchment as set out in its submission on Variation 1. Therefore FFNZ does not agree to the amendments to paragraphs 1(a) and (d) , and the new paragraph 4 and considers they ought to be deleted. FFNZ considers that reasonable standards and conditions are applied to the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules). However, FFNZ considers that the proposed amendments go beyond this and does not support them. In principle FFNZ agrees that appropriate procedures to ensure competency ought to be adopted but considers that further thought needs to be given to monitoring and compliance i.e. whether it will be done by the CIS and to ensure no micromanagement and a pragmatic approach to monitoring and compliance. However, FFNZ

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			<p><u>Certified Industry Scheme and to communication with external stakeholders.</u></p> <p><u>4. Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p><u>35. Has documented systems, processes, and...</u></p> <p>a. <u>Competent and consistent performance in preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p> <p>b. <u>Effective internal monitoring of performance, including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. <u>Robust data management (both spatial and temporal)...</u></p> <p>d. ...</p> <p>e. <u>Timely and appropriate detailed reporting, including (but not limited to):</u></p> <p><u>i. progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p><u>ii. current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p>		<p>considers that the proposed amendments go beyond this and does not support them.</p> <p>In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore it does not support the proposal to make FEPs a controlled activity.</p>

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			<p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. <u>Internal quality control and verification.</u></p> <p>i. <u>The responsibilities and accountability of all parties to the Certified Industry Scheme are clearly stated and enforced...</u></p> <p>j. <u>An accurate and up to date register of scheme membership is established and maintained ...</u></p> <p>k. ...</p> <p>l. <u>The articles of the scheme, including its register of membership are available for public viewing.</u></p> <p>B. People The application must demonstrate...</p> <p>1. These<u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. <u>Auditing of Farm Environment Plans - prepared under the Certified Industry Scheme - requirements will</u></p>		

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			<p><u>be undertaken by the parties that are accredited auditors</u> and independent of the Farm...</p> <p>c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1."</p> <p>Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>		
<p>Waikato and Waipa River Iwi Submitter ID: 74035</p>	<p>PC1-3668</p>	<p>Schedule 2</p>	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System The application must <u>clearly</u> demonstrate that the...</p> <p>a. the achievement ofthe water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u></p> <p>d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></p> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the</u></p>	<p>Oppose in part</p>	<p>FFNZ does not support the 80 year numeric targets or the adoption of an allocation approach or an approach that enables collectives (or other bodies) to allocate or require reductions. FFNZ supports the use of FEPs the tailor mitigations to the farm enterprise and sub-catchment as set out in its submission on Variation 1. Therefore FFNZ does not agree to the amendments to paragraphs 1(a) and (d) , and the new paragraph 4 and considers they ought to be deleted.</p> <p>FFNZ considers that reasonable standards and conditions are applied to the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules). However, FFNZ considers that the proposed amendments go beyond this and does not support them.</p> <p>In principle FFNZ agrees that appropriate procedures to ensure competency ought to be</p>

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			<p><u>coordinated management of Farm Management Plans.</u></p> <p><u>3. Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p><u>4. Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p><u>5. Has documented systems, processes, and...</u></p> <p>a. Competent and consistent performance in <u>preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p> <p>b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. Robust data management (<u>both spatial and temporal</u>)...</p> <p>d. ...</p> <p>e. Timely and <u>appropriate detailed reporting, including (but not limited to):</u></p> <p>i. <u>progress with putting in place and implementing mitigation actions from</u></p>		<p>adopted but considers that further thought needs to be given to monitoring and compliance i.e. whether it will be done by the CIS and to ensure no micromanagement and a pragmatic approach to monitoring and compliance. However, FFNZ considers that the proposed amendments go beyond this and does not support them.</p> <p>In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore it does not support the proposal to make FEPs a controlled activity.</p>

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			<p><u>Farm Environment Plans within the Certified Industry Scheme; and</u> <u>ii. current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u> <u>f. Corrective actions will be implemented where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u> <u>g. Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u> <u>h. Internal quality control and verification.</u> <u>i. The responsibilities and accountability of all parties to the Certified Industry Scheme are clearly stated and enforced...</u> <u>j. An accurate and up to date register of scheme membership is established and maintained ...</u> <u>k. ...</u> <u>l. The articles of the scheme, including its register of membership are available for public viewing.</u> <u>B. People</u> <u>The application must demonstrate...</u> <u>1. TheseThe nominated parties responsible for generating and auditing Farm Environment Plans are</u></p>		

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			<p><u>Certified Farm Environment Planners</u> suitably qualified and experienced.</p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors and independent of the Farm...</u></p> <p>c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1."</p> <p>Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>		
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11390	Schedule 2	DELETE Schedule 2.	Oppose	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. Therefore FFNZ considers Schedule 2 ought to be retained.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2154	Schedule 2	AMEND to ensure Waikato Regional Council have a robust audit system for on-going quality control of schemes.	Support in part	FFNZ agrees that reasonable standards and conditions (including audit and quality control) ought to apply to the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Department of Conservation Submitter ID: 71759	PC1-11061	3.11.6 List of Tables and Maps	AMEND the target in PPC1 for E.coli to ' <u>260/100ml</u> ' rather than the proposed 540/100ml. AND FURTHER INVESTIGATE the water quality effects (such as nitrate toxicity) on ecosystem health, particularly with respect to native fish and macroinvertebrates, and make changes to targets as appropriate. Refer to the submitter's Appendix B "Changes sought to trophic state and toxicity attributes by Proposed Plan Change 1" for more detail AND AMEND the 10-year and 80-year limits/targets to be more ambitious and have a stronger emphasis on ecosystem health to ensure that the Vision and Strategy is given effect to. AND AMEND PPC1 to include interim 20-year targets to ensure future targets beyond the initial 10-year period that continues to work toward the longer term 80-year targets.	Oppose	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. FFNZ opposes the submitter's Appendix B for reasons including that it will likely impose significant cost for no net benefit. FFNZ also does not consider it necessary to adopt numeric targets in order to give effect to the Vision & Strategy. FFNZ considers it premature to adopt 20 year targets and has concerns including that insufficient information and science is available to adopt such targets and doing so will likely impose significant cost for no net benefit.
Fulton Hogan Limited Submitter ID: 74048	PC1-10882	3.11.6 List of Tables and Maps	AMEND Chapter 3.11.6 (paragraph 1) to read: "Table 3.11-1: short term and long term <u>desired</u> numerical water quality states targets for the Waikato and Waipā River Catchments...". AND AMEND Chapter 3.11.6 (paragraph 2) to read: "Within the Waikato and Waipā River catchments, these targets <u>desired water quality states</u> are used in decision-making...".	Support in part Oppose in part	FFNZ agrees that clarification is required to adopt consistent terminology with NPS-FM. FFNZ concerned that the 10 year targets will impose significant cost and that ought to be addressed. FFNZ agrees that it ought to be the desired water quality state that are aimed for but does not support numeric 80 year targets and considers these ought to be deleted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND Chapter 3.11.6 (paragraph 2) to read: "...pathogens, it is not intended, nor is it the nature of water quality targets, that they be...".</p> <p>AND AMEND Chapter 3.11.6, Explanatory note to Table 3.11-1, to read: "The tables set out the concentrations (all attributes except clarity) or visibility distance (clarity attribute) to be <u>maintained or</u> achieved by actions taken in the short term and at over 80 years for rivers and tributaries, and at 80 years for lakes FMUs. Where water quality is currently high (based on 2010-2014 monitoring data), <u>the desired water quality state</u> short term and 80-year targets will be the same as the current state...".</p> <p>AND AMEND Chapter 3.11.6, Explanatory note to Table 3.11-1 (last sentence), to read: "Where water quality needs to improve, <u>the water quality states</u> values to be achieved at a..."</p> <p>AND AMEND bullet point 1 to read: "...The short term and 80-year targets <u>desired water quality state</u> are set at..."</p> <p>AND AMEND bullet point 2 to read: "... The 80-year <u>desired water quality state</u> targets is 540 <i>E.coli</i> / 100ml and the short term target is set at 10% of the difference between the current</p>		<p>FFNZ considers that the wording "nor is it the nature of water quality targets" ought to be retained to ensure that they are not relied upon as part of an over allocation or property level allocation assessment.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			state value and the 80 year <u>state target</u> ." AND AMEND paragraph 5 to read: "The achievement of the <u>attribute targets desired water quality states</u> in Table 3.11-1 will be...". AND AMEND paragraph 5 (second sentence), to read: "...mitigations may mean that the <u>targets desired states</u> are not observed for every...".		
Lakes and Waterways Action Group Trust (LWAG) Submitter ID: 53342	PC1-4073	3.11.6 List of Tables and Maps	AMEND 3.11.6 Table and Maps so that freshwater objectives (broad numerical) are included from the catchment (or Freshwater Management Unit) to sub-catchment level that are not set lower than current water quality. AND AMEND to include the following parameters as freshwater state objectives: dissolved oxygen, deposited and suspended sediment; Freshwater Macroinvertebrate Health; Cyanobacteria and benthic cyanobacteria; Dissolved Inorganic Nitrogen and Total Nitrogen in the tributaries/sub-catchments; Temperature, pH; Water flows and levels.	Oppose in part	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. FFNZ also considers that maintain ought to be maintain within a NOF band therefore does not support a requirement for numeric water quality states to be maintained. FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.
Miraka Limited Submitter ID: 73492	PC1-8900	3.11.6 List of Tables and Maps	AMEND Table 3.11-1 to provide attribute information at the sub-catchment scale.	Support in part Oppose in part	In principle, FFNZ supports consideration of sub-catchments. However, FFNZ is concerned that there is insufficient information and science currently available and adopting a too detailed approach to sub-catchments may mean adopting unreasonable assumptions and imposing significant cost for no net benefit.

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Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8828	3.11.6 List of Tables and Maps	AMEND Table 3.11-1 and the Objective of PPC1 to ensure consistency with the National Policy Statement for Freshwater Management 2014. AND AMEND to clarify that the targets are aspirational goals. AND if the targets in Table 3.11-1 are retained then AMEND by clarifying how targets will be applied to the implementation of PPC1.	Support in part Oppose in part	FFNZ agrees that Table 3.11-1 and the objectives need to be consistent with the NPS-FM and that amendments are needed to achieve that (see FFNZ's submission on Variation 1). Notwithstanding FFNZ's opposition of the 80 year numeric targets and view that they ought to be deleted (see FFNZ's submission on Variation 1), FFNZ agrees that it ought to be clarified that the targets are aspirational goals. FFNZ agrees that if the targets remain it ought to be clarified how they will be applied and FFNZ considers that any implementation approach ought to be reasonable, practical and affordable. It also ought to not be based on a property level allocation approach and on an approach that maintain means maintain within a NOF band.
Pamu Farms of New Zealand Submitter ID: 74000	PC1-5818	3.11.6 List of Tables and Maps	AMEND 3.11.6 to clarify how Table 3.11-1 it will be applied. AND ADD to the Objectives the narrative from 3.11.6.	Support in part Oppose in part	FFNZ agrees that if the targets remain it ought to be clarified how they will be applied and FFNZ considers that any implementation approach ought to be reasonable, practical and affordable. It also ought to not be based on a property level allocation approach and on an approach that maintain means maintain within a NOF band. FFNZ supports a narrative approach to water quality targets and Vision & Strategy and values (see FFNZ's submission on Variation 1) so it would support the approach to add to the objectives in the narrative as long as it was consistent with FFNZ's submission on Variation 1.
Waikato Regional Council Submitter ID: 72890	PC1-2978	3.11.6 List of Tables and Maps	AMEND Map 3.11-1 and Map 3.11-2 so that the north-eastern area of the Waikato and Waipā River catchment	Oppose in part	FFNZ considers it ought to be included but that amendments ought to be made as proposed in FFNZ's submission on Variation 1.

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			that has been withdrawn is not included in the maps.		
Waipapa Farms Ltd and Carlyle Holdings Ltd Submitter ID: 73863	PC1-4752	3.11.6 List of Tables and Maps	RETAIN the acknowledgement that the effect of some contaminants (particularly nitrogen) discharged from land has not yet been seen in the water and there is a lag. AMEND provisions of PPC1 to reflect this.	Oppose in part	If this is to remain, FFNZ considers that it needs to be clarified that a range of factors are not able to be quantified at this stage including attenuation and groundwater travel time or the nature and extent of historical discharges.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2155	3.11.6 List of Tables and Maps	AMEND Table 3.11-1 to provide attribute information at sub-catchment scale. AND REPLACE Map 3.11-1 with a new Map 3.11-2 AND REPLACE Map 3.11-2 with new sub-catchments that align with the physical attributes of the land.	Support in part Oppose in part	FFNZ agrees that the FMU basis may not be appropriate spatial scale to manage freshwater but considers that further work is required to assess the appropriate scale e.g. sub-catchment or group of sub-catchments and to take a tailored approach that is suitable and appropriate for the area of the groundwater catchment involved.
Waitomo District Council Submitter ID: 73688	PC1-10859	3.11.6 List of Tables and Maps	AMEND Table 3.11-1 to ensure appropriate account has been taken in setting the E.coli limits to make allowance for peak flooding events.	Support	FFNZ agrees that E coli states or targets ought to reasonably provide for flooding and spikes and such anomalies need to be addressed.
Alcock and Easton, Jo and John Submitter ID: 73374	PC1-9215	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to ensure the water quality targets are achievable AND AMEND to ensure that full achievement of Objective 1 and Table 3.11-1 does not result in underachievement of the objectives relating to social, cultural and economic health and well-being of people and communities.	Support in part	FFNZ agrees that water quality targets ought to be achievable and social, economic and cultural wellbeing needs to be taken into account. For these reasons FFNZ considers the 80 year numeric targets ought to be deleted (see FFNZ's submission on Variation 1).
Allan, Eric Submitter ID: 73438	PC1-6112	Table 3.11-1: short term and long term numerical water quality targets	AMEND PPC1 to strengthen the requirements to provide for economic well-being, including vibrancy and resilience of farming within the region and certainty for the future.	Support in part	FFNZ agrees that water quality targets ought to be achievable and take into account available technology as well as provide for the social, economic and cultural wellbeing. For these reasons FFNZ considers the 80 year numeric targets ought

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND Table 3.11-1 water quality targets to ensure that while achieving the Vision and Strategy for the Waikato River targets are also achievable given current land uses and technology.		to be deleted (see FFNZ's submission on Variation 1).
Aston, Lucy Submitter ID: 73020	PC1-6995	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 so the water quality targets are achievable and that farmers and communities remain prosperous currently as well as during the 80 year period. AND AMEND Table 3.11-1 so the numerical targets do not apply during flood events.	Support in part	FFNZ agrees that water quality targets ought to be achievable and take into account available technology as well as provide for the social, economic and cultural wellbeing. For these reasons FFNZ considers the 80 year numeric targets ought to be deleted (see FFNZ's submission on Variation 1). FFNZ agrees that targets ought to reasonably provide for flooding and spikes and such anomalies need to be addressed (including providing for the targets not to apply or be measured during flood events).
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6249	Table 3.11-1: short term and long term numerical water quality targets	AMEND numeric water quality targets in table 3.11-1 to align with Scenario 2. AND AMEND in accordance with relief sought regarding land use change, land use flexibility and off-set mitigation.	Support in part	FFNZ agrees that water quality targets ought to be achievable and social, economic and cultural wellbeing needs to be taken into account. For these reasons FFNZ considers the 80 year numeric targets ought to be deleted (see FFNZ's submission on Variation 1). Alternatively and outcome like scenario 2 ought to be achieved. FFNZ agrees with flexibility for land use change and offset mitigation.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11004	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 so that 80-year attributes and targets are consistent with ecosystem health measures and achieving healthy freshwater ecosystems AND AMEND the numerical 80-year targets to give effect to the water	Oppose	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. FFNZ also considers that maintain ought to be maintain within a NOF band therefore does not

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			<p>quality objectives of the Vision and Strategy AND AMEND Table 3.11-1 to include a range of attribute targets for all sites and sub-catchments that provide a clear linkage and assessment and measurement chain from the desired freshwater outcome to required reductions in nutrient loss from land by way of an allocation system AND AMEND to include attribute targets that enable an accurate characterisation of water quality and ecosystem health AND that ensure freshwater resources are sustainably managed, provide for the habitat of trout and indigenous fish and the significant values of wetlands, AND that measure progress toward outcomes and enable reviews to assess the effectiveness of PPC1 AND AMEND to include appropriate sites for every sub-catchment AND AMEND to define and refine short-term attribute targets for all sites AND AMEND the explanatory narrative to read: <u>"Actions put in place and implemented by 2036 to reduce discharges of nitrogen, phosphorous, sediment and microbial pathogens, have achieved thirty percent of the required change between current water quality and the 80 year water quality attribute targets</u></p>		<p>support a requirement for numeric water quality states to be maintained.</p> <p>FFNZ does not agree with the submitter's assessment of or interpretation of the Vision & Strategy, ecosystem health, wetlands, rivers etc and considers that they do not reasonably provide for farming and will impose significant social, cultural and economic cost for uncertain environmental benefit and for no net benefit.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>in Table 3.11-1 once this Plan has been operative for 20 years." AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2 AND AMEND Table 3.11-1 to adopt the amendments sought for rivers and streams, and add appropriate indicators for lakes and wetlands, as detailed in the table in Appendix 1 of the submission (pages 66 to 69).</p>		
Awaroa Lands Ltd Submitter ID: 73627	PC1-6597	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 so targets do not apply during flooding.	Support in part	FFNZ agrees that targets and measurements ought to exclude flood events or spikes and ensure anomalies do not distort results, targets and monitoring.
Bailey, James Submitter ID: 73926	PC1-4787	Table 3.11-1: short term and long term numerical water quality targets	<p>AMEND Table 3.11-1 to give effect to the Vision and Strategy including all 13 of its objectives with endorsement from all five river iwi AND AMEND to give effect to the National Policy Statement for Freshwater Management AND AMEND to provide for healthy and vibrant communities AND AMEND to give effect to water quality outcomes that are actually achievable. AND MAKE consequential amendments. AND AMEND Table 3.11-1 to make stock exclusion consistent with central Government's recommendations being proposed through the advice of the Land and Water Forum</p>	<p>Support in part Oppose in part</p>	<p>FFNZ agrees that all objectives of the Vision & Strategy are likely to be relevant. FFNZ considers that the 80 year numeric targets ought to be deleted and a narrative approach that refers to the values (which appear to reflect the objectives in the Vision & Strategy) and achievement of the Vision & Strategy in the long term (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports giving effect to the NPS-FM and maintaining water quality within a NOF band.</p> <p>FFNZ is concerned that there are no national stock exclusion requirements and the draft regulations had several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach that is not based on slope but instead based on stock units or a narrative approach (see FFNZ's submission on Variation 1).</p>

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			<p>AND AMEND to place a strong emphasis on identifying and addressing critical source areas through the farm planning process</p> <p>AND AMEND to use the sub-catchment approach by incentivising the development of catchment groups to work alongside Council to identify and target contaminant hot spots.</p>		<p>FFNZ agrees that water quality targets ought to be achievable and social, economic and cultural wellbeing needs to be taken provided for.</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports non-regulatory coordinated sub-catchment approaches and the provision of incentives and funding.</p>
<p>Beef + Lamb New Zealand Limited Submitter ID: 73369</p>	<p>PC1-11158</p>	<p>Table 3.11-1: short term and long term numerical water quality targets</p>	<p>AMEND Table 3.11-1 so that the numerical outcomes recognise and provide for the values under Section 3.11.1 Objective 1A.</p> <p>AND AMEND numerical outcomes (limits/targets, including interim targets) at levels which give effect to the National Policy Statement for Freshwater Management (2014) and in particular Policies CA2 and CA3.</p> <p>AND AMEND to consider the provision of economic well-being, including economic opportunities.</p> <p>AND AMEND to provide for water quality below national bottom lines which results from natural processes and/or from the impacts of national and regionally significant infrastructure.</p> <p>AND AMEND to adopt numerical limits that are appropriate to achieving desired outcomes and are applied at appropriate levels of flow that match the values.</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive.</p> <p>FFNZ also considers that maintain ought to be maintain within a NOF band therefore does not support a requirement for numeric water quality states to be maintained.</p> <p>FFNZ does not support amendments to include additional freshwater states or targets for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ supports changes to targets to reasonably provide for or accommodate flood events and spikes and anomalies.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND numerical water quality targets to Freshwater Objectives as appropriate (i.e. chlorophyll a, clarity, E.coli) AND REMOVE these parameters from Table 3.11-1.</p> <p>AND AMEND as follows: <u>"E.coli 260/100 ml < 50th percentile applies 1 November to 30 April when the river is below medium flow:</u> <u>E.coli 550/100 ml < 20th percentile the concentration of E.coli must not exceed 550 per 100 ml year round when flow is at or below the 20th flow exceedance percentile (i.e. not in the top 20 percent of flows)</u> <u>The visual clarity of the water measured as the horizontal sighting range of a black disc must equal or exceed [Table 3.11-1 numerical parameter given in meters] when the river is at or below medium flow (the 50th flow exceedance percentile)."</u></p> <p>AND AMEND so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications.</p> <p>AND AMEND Table 3.11-1 interim targets so that they apply at a longer time frame such as 30 years, for those parameters which are significantly over allocated now AND</p>		<p>FFNZ does not support adopting 30 year or other interim targets for reasons including that it is premature when the catchment is not well understood, this would rely on assumptions and would likely result in significant cost for no net benefit. FFNZ prefers an approach that undertakes a stock take in 10 years and does not pre-empt the outcome of that stocktake (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not support a requirement for progressive reduction and prefers an approach based on management of discharges, targeting hot spots and considered appropriate responses (see FFNZ's submission on Variation 1).</p> <p>FFNZ opposes a table in Policy 1 to set nitrogen loads for reasons including that the catchment is poorly understood (including attenuation, load to come, groundwater travel time), this may lead to or be used to justify an allocation approach (FFNZ does not support allocation) and is likely to result in significant cost for no net benefit (see FFNZ's submission on Variation 1).</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AMEND the interim targets so that they progressively reduce over allocation at a rate and scale which provides for people and community resilience including economic well-being.</p> <p>AND AMEND Table 3.11-1 so that PPC1 provides a pathway for individuals and communities to work together to achieve the Vision and Strategy over the long term.</p> <p>AND AMEND Policy 1 and Table 3.11-1 OR ADD a NEW Policy which sets out the:</p> <p>a) Current Nitrogen load (<i>footnote: Current Nitrogen load includes both the Allowable in-stream nitrate load to achieve current in-stream Nitrogen concentration and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land</i>)</p> <p>b) Desired Nitrogen load (<i>footnote: Desired Nitrogen load includes both the Allowable in stream nitrate load to achieve the desired in-stream Nitrogen concentration, and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land</i>)</p> <p>c) Nitrogen discharge rate/ha/year to achieve current Nitrogen load</p> <p>d) Nitrogen discharge rate/ha/year to achieve the desired Nitrogen load</p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND Table 3.11-1 and PPC1 Objectives to make a clear distinction between what are Freshwater Objectives, Attributes, limits and targets. Freshwater Objectives would include values of freshwater such as cultural, ecological, primary production, commercial, and recreational and may include numerical parameters for periphyton, chlorophyll a, macroinvertebrate community indices (MCI) and sediment and clarity.</p> <p>AND AMEND Table 3.11-1 to include the allowable instream load and maximum allowable zone load (MAZL) for Nitrogen for all sub-catchments and Freshwater Management Units. Nitrogen loads should be provided which relate to: current instream Nitrogen concentrations and desired instream Nitrogen concentrations. The instream loads should form the basis of an allocation framework for Nitrogen, if allocation frameworks are deemed necessary, to assist with achievement of the Objectives of PPC1.</p> <p>AND AMEND Table 3.11-1 so that numerical parameters provide for the values of freshwater, including safeguarding the life supporting capacity of freshwater, cultural and primary production values, and meet the Objectives of PPC1. In particular,</p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>the E.coli and clarity numerical parameters (Freshwater Objectives) are to be amended so that they can take into account flow and background contaminant levels, natural events and regional and nationally significant infrastructure, and are commensurate with the level of pathogenic risk for contact recreation and cultural values. E.coli and clarity numerical parameters (Freshwater Objectives) should not apply during higher flow events (i.e. above 2x the medium flow), or during the flow recession curve, The approach adopted in the Horizons region is supported (see suggested wording for E.coli and visual clarity above).</p> <p>AND AMEND Table 3.11-1 following implementation of Policy CA2 such that it gives the effect to Policy CA2 (f) (iv) and (v) and Policy CA3 of the National Policy Statement for Freshwater Management 2014.</p>		
Buckley, Peter Ross Submitter ID: 71423	PC1-1368	Table 3.11-1: short term and long term numerical water quality targets	<p>DELETE from Table 3.11-1 the flood/high flow conditions from water quality target data.</p> <p>AND AMEND to take a holistic approach and include all source influencing the health and well-being of the Waikato River and its catchments, including koi carp, point source discharges and hydro-dams.</p> <p>AND AMEND to address contaminants on sub-catchment</p>	Support in part Oppose in part	<p>FFNZ agrees that targets and measurements ought to exclude flood events or spikes and ensure anomalies do not distort results, targets and monitoring.</p> <p>FFNZ supports a holistic approach to consider all sources of discharges.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			basis to enable targeting of the highest discharging sub-catchments.		submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.
Charion Investment Trust Submitter ID: 71344	PC1-7800	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to ensure the attributes are consistent with objectively determined world standards, not subjectively determined local standards.	Support in part Oppose in part	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. While FFNZ considers that targets ought to be objective, reasonable, practical and affordable it can see merit in having reasonable tailoring to take into account local circumstances.
CNI Iwi Land Management Limited Submitter ID: 74026	PC1-10772	Table 3.11-1: short term and long term numerical water quality targets	AMEND 80 year numerical attribute targets for nitrogen so that they are expressed as a single set of Total Nitrogen numerical attribute targets measured in the main stem of the Waikato River at the bottom of each Freshwater Management Unit. AND AMEND the 10 year numerical nitrogen attribute targets to show greater consistency between sub-catchment load, recognising that the degree of reduction required is proportionate to the amount of current discharge (those discharging more nitrogen are expected to make greater reductions). AND AMEND Table 3.11-1 for all the nitrogen targets to: 1. REMOVE the 80 year numerical nitrogen attribute targets for from each sub-catchment; and 2. Ensure that the 10-year numerical nitrogen attribute targets reflect a	Oppose	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. FFNZ does not support the adoption of the total nitrogen or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1). FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>reduction framework based on necessary reductions, not on a reaction to current loads. AND AMEND Table 3.11-1 in respect of E.coli and Chlorophyll a to: 1. ADD 80 year numerical attribute targets for E.coli and water clarity for the Waikato River main stem and sub-catchments; and 2. ADD 80 year numerical attribute targets for Chlorophyll a for the Waikato River main stem; AND AMEND Table 3.11-1 for Total Nitrogen and Total Phosphorus to retain the 10 year Total Nitrogen and Total Phosphorus numerical attribute targets for the Waikato River main stem. AND AMEND the 80 year Total Nitrogen and Total Phosphorus numerical attribute targets to a single point at the bottom of each Freshwater Management Unit.</p>		<p>FFNZ supports a proportionate approach but not based on a strict numeric or allocation approach.</p> <p>For these reasons and for reasons set out further in FFNZ's submission, FFNZ opposes the proposed changes.</p>
DairyNZ Submitter ID: 74050	PC1-10188	Table 3.11-1: short term and long term numerical water quality targets	<p>AMEND the 4th paragraph of the explanation of table 3.11-1 (page 56) to read: "The achievement of the attribute targets in Table 3.11-1 will be determined through analysis of 5-yearly monitoring data. <u>Table 3.11-1 lists existing water quality monitoring sites. There is a monitoring site within each sub-catchment. However, the site does not necessarily represent all the surface water flowing from that sub-catchment, as monitoring sites</u></p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports amendments to clarify potential issues or limitations with existing monitoring sites and to provide for an evaluation of whether the sites are in the correct location and whether more appropriate data can be gathered.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>are not all at the downstream confluence of the tributary and the main stem of the Waikato or Waipā River. The variability in water... in the short term. Therefore, Waikato Regional Council will rely on collating and reporting actions put in place, as set out in Policy 1(d), and Methods 3.11.4.10 and 11."</u></p>		
<p>Department of Conservation Submitter ID: 71759</p>	<p>PC1-10536</p>	<p>Table 3.11-1: short term and long term numerical water quality targets</p>	<p>REINSTATE the withdrawn parts of Table 3.11-1. AND establish attributes, limits or targets for all contaminants specified in the Vision and Strategy (nutrients, faecal and sediment) for the whole of the Waipā catchment and all tributaries of the Waikato, lakes, wetlands and the coastal environment (refer submitter's Appendices A and B, and D to I). AND AMEND the headings of Table 3.11-1 to provide dates for when targets are to be met. AND AMEND to include interim 20-year targets to sit alongside the 10-year targets and 80-year targets. A 20 per cent improvement in water quality over 20 years is recommended. AND RAISE water quality targets for lakes, so that lake water quality is enhanced, to safeguard ecosystem health and life supporting capacity of lakes, and to ensure that 'long term restoration and protection of water quality' is achieved.</p>	<p>Oppose</p>	<p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive.</p> <p>FFNZ also considers that maintain ought to be maintain within a NOF band therefore does not support a requirement for numeric water quality states to be maintained.</p> <p>FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ does not agree with the submitter's assessment of or interpretation of the Vision & Strategy, ecosystem health, wetlands, rivers etc and considers that they do not reasonably provide for farming and will impose significant social, cultural and economic cost for uncertain environmental benefit and for no net benefit.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND INSERT attribute targets for Pungarehu Canal/Stream to Table 3.11-1.</p> <p>AND INSERT targets for suspended sediment and deposited fine sediment in Table 3.11-1.</p> <p>AND AMEND Table 3.11-1 to recognise and identify the values of outstanding freshwater bodies (in discussion with the Department of Conservation) and as a minimum, these outstanding freshwater bodies should include the Waikato River including the river mouth and delta, the Whangamarino wetland, the Waitomo Caves/River, the Waikato Peat lakes and Lake Rotokotuku.</p> <p>AND FURTHER INVESTIGATE the water quality effects (such as nitrate toxicity) on ecosystem health, particularly with respect to native fish and macroinvertebrates, and make changes to targets as appropriate. Refer to specific changes requested in the submitter's Appendix B "Changes sought to trophic state and toxicity attributes by Proposed Plan Change 1".</p> <p>AMEND Table 3.11-1 to include attributes for a Whangamarino Wetland Fresh Water Management Unit, as described in the submitter's Appendix E and F.</p>		<p>FFNZ does not agree to 20 year targets or a required 20% improvement in water quality for reasons including that it is premature to adopt numeric targets beyond 10 years when there is so much uncertainty (e.g. incomplete or inadequate monitoring, poor understanding of load to come and attenuation, poor understanding of impacts of pests, natural sources and hydro dams etc) and considers that first 10 years should be treated as an opportunity to identify and address information gaps and a stocktake undertaken in 10 years time (see FFNZ's submission on Variation 1).</p> <p>FFNZ is also concerned that such an approach will result in significant cost for no net benefit. Therefore FFNZ opposes the proposal to adopt additional targets or % reductions or timeframes.</p> <p>FFNZ supports a moderated approach to lakes and wetlands to better understand water quality issues and refers to its submission on Variation 1. Therefore it opposes the submitter's proposed Appendix E and F.</p>
Downie, Janna	PC1-10138	Table 3.11-1: short term and	AMEND PPC1 so that a greater range of freshwater attributes are	Oppose	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 71903		long term numerical water quality targets	<p>managed: Te Hauora o te Taiao; natural character; dissolved oxygen (DO); deposited and suspended sediment; Freshwater Macroinvertebrate Health (Macroinvertebrate Community Index); periphyton; cyanobacteria; benthic cyanobacteria; temperature; pH; toxic heavy metals; barriers to fish migrations; and water flows and levels; and Dissolved Inorganic Nitrogen (DIN); total nitrogen; and total phosphorous in the tributaries and sub-catchments</p> <p>AND ADD instream limits and associated targets for nitrogen loads, phosphorous loads, sediment loads, E.coli, toxic contaminant loads such as metals or organic compounds, micro-organisms and temperature</p> <p>AND ADD load thresholds in sub-catchments and catchments that are under resource use pressure</p> <p>AND AMEND so that contaminant allocations are based on Land Use Capability rather than on historic practice (grandparenting).</p>		<p>therefore opposes any proposal to make the targets more stringent or restrictive.</p> <p>FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ does not support the adoption of the total nitrogen, total phosphorous or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not support allocation of nitrogen for reasons including that there is no reliable or equitable basis for allocation. FFNZ does not support the use of LUC to allocate nitrogen for reasons including that it is not a proxy for nitrogen leaching. FFNZ is concerned that it is premature to decide that nitrogen needs to be allocated or that LUC is the appropriate basis. FFNZ is concerned that such an approach will impose significant cost for no net benefit.</p>
Eel Enhancement Company Limited	PC1-4259	Table 3.11-1: short term and long term	AMEND PPC1 to apply the property scale Nitrogen Reference Point system to cover sediment including	Oppose	FFNZ supports the NRP provided it is used as a reference point and is not used to grandparent nitrogen. FFNZ considers that flexibility needs to be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73062		numerical water quality targets	fine sediment and apply 80 year targets.		<p>provided to use alternative models to Overseer, recognise mitigations outside of Overseer and/or use different input assumptions or use actual data instead of defaults. FFNZ refers further to its submission on Variation 1. FFNZ does not support extending the NRP to phosphorous or allocation of phosphorous to a property level.</p> <p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive.</p> <p>FFNZ does not support amendments to include additional freshwater states or targets for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p>
Farm Environment Trust (Waikato) Submitter ID: 73798	PC1-5054	Table 3.11-1: short term and long term numerical water quality targets	AMEND to CLARIFY how the Farm Environment Plans link to targets that are set in Table 3.11-1. AND AMEND so Farm Environment Plans have a flexible approach that allows the targeting of the critical contaminant in that sub-catchment.	Support in part Oppose in part	<p>FFNZ would support clarification if it was on the basis that there is no property level allocation of targets, 80 year targets are deleted and FEPs have regard to Catchment Profiles as set out in FFNZ's submission on Variation 1.</p> <p>FFNZ support flexible, tailored and proportionate FEPs that target critical source areas.</p>
Farmers 4 Positive Change (F4PC) Submitter ID: 73355	PC1-10418	Table 3.11-1: short term and long term numerical water quality targets	AMEND PPC1 after working with farmers to form a long-term plan that achieves the Vision and Strategy AND REVIEW the interpretation of the Vision and Strategy, including numerical interpretation through	Support in part Oppose in part	<p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. FFNZ supports a narrative approach for the long term to refer to the</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Table 3.11-1 AND AMEND Table 3.11-1 to ensure the numerical parameters are achievable while giving effect to the Vision and Strategy AND AMEND PPC1 to have realistic achievable goals AND AMEND PPC1 to give farmers confidence to invest and encourage young people into the sector.		values and Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ also considers that maintain ought to be maintain within a NOF band therefore does not support a requirement for numeric water quality states to be maintained. FFNZ agrees that economic, social and cultural wellbeing needs to be provided for and certainty and confidence to invest.
Gavins Limited Submitter ID: 73846	PC1-5517	Table 3.11-1: short term and long term numerical water quality targets	AMEND water quality targets recognising that birdlife contributes to E.coli levels and that their contribution is currently unknown and difficult to control. AND undertake research and analysis to understand the contributing factors to E.coli levels by birdlife in the greater Waikato catchment.	Support in part	FFNZ agrees that E coli targets and monitoring ought to take into account the source of E coli and reasonably provide for this.
GBC Winstone Submitter ID: 73992	PC1-3627	Table 3.11-1: short term and long term numerical water quality targets	AMEND preamble to Table 3.11-1 as follows: "Short term and long term <u>desired</u> numerical water quality <u>states</u> targets for the Waikato and Waipā ..." AND AMEND preamble to Table 3.11-1 as follows: "Within the Waikato and Waipā River catchments, these targets <u>desired water quality states</u> are used in decision... pathogens, it is not intended, nor is it in the nature of water quality targets, that they be used..." AND AMEND Explanatory note to Table 3.11-1 as follows: "The tables	Support in part Oppose in part	FFNZ agrees that clarification is required to adopt consistent terminology with NPS-FM. FFNZ concerned that the 10 year targets will impose significant cost and that ought to be addressed (see FFNZ's submission on Variation 1). FFNZ agrees that it ought to be the desired water quality states that are aimed for but does not support numeric 80 year targets and considers these ought to be deleted. FFNZ considers that the wording "nor is it the nature of water quality targets" ought to be retained to ensure that they are not relied upon as part of an

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			<p>set out the concentrations ...(clarity attribute) to be <u>maintained or</u> achieved by actions taken in the short term and at over 80 years for rivers ... 2010-2014 monitoring data), <u>the desired water quality states</u>short term and 80-year targets will be the same as... Where water quality needs to improve, the water quality <u>states</u>values to be achieved..."</p> <p>AND AMEND Explanatory note to Table 3.11-1 as follows:</p> <ul style="list-style-type: none"> • "the current state value... The short term and 80-year targets<u>desired water quality state</u> are set at... • the current state value for E.coli... The 80-year <u>desired water quality state</u>target is 540... and the 80 year <u>state</u>target." <p>AND AMEND Explanatory note to Table 3.11-1 (second to last paragraph on page 65) as follows: "The achievement of the attribute targets<u>desired water quality states</u> in Table 3.11-1 will be... may mean that the targets<u>desired states</u> are not observed for every..."</p>		<p>over allocation or property level allocation assessment.</p> <p>FFNZ considers that maintain should be within a NOF band and not maintain numeric attribute states.</p>
Genetic Technologies Ltd Submitter ID: 73953	PC1-3334	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to state the priority attributes that need addressing in each sub-catchment.	Support in part Oppose in part	In principle FFNZ supports a prioritised approach that targets hot spots (see FFNZ's submission on Variation 1). However, it has concerns including with how the sub-catchments have been prioritised and has concerns that stating prioritised attributes in

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					sub-catchments may have the same flaws and/or may result in an allocation approach.
Gleeson, Graeme B Submitter ID: 73800	PC1-6443	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 so that the E.coli limits are more specific - E.coli target of 260/100ml applies from 1 November to 30 April when the water way flow is below the medium level, and the target of 550/100ml applies except when the flow is in the top 20 percent of flows. AND AMEND Table 3.11-1 so that the water quality targets are achievable, provide for ecosystem health and enable prosperous, vibrant communities. AND AMEND water quality targets to provide for ecosystem health and cultural values, but also enable the social and economic well-being of people and communities.	Support in part Oppose in part	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit. FFNZ agrees that any targets need to enable social and economic wellbeing of people and communities.
Greenplan Holdings Limited Submitter ID: 73893	PC1-3080	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 after further evidence is collected that shows the table is realistic and achievable	Support in part	FFNZ agrees that Table 3.11-1 ought to be amended when further information is available e.g. better monitoring sites, better understanding of attenuation and load to come, better modelling etc. It also considers that they ought to be realistic and achievable. However it considers that the 80 year targets ought to be deleted until more realistic ones can be proposed as opposed to retaining then amending (see FFNZ's submission on Variation 1).
Hawkes, Irwin Lawrence and Yvonne Jean Submitter ID: 73890	PC1-4931	Table 3.11-1: short term and long term numerical water quality targets	DELETE PPC1 and REPLACE with objectives which numerical water quality limits/targets which consider the reality of the Waikato, which are achievable, provide for the protection of its life supporting capacity, while also ensuring that the health and	Support in part	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. FFNZ also considers that maintain ought to be maintain within a NOF band therefore does not

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			well-being, including social and economic values, of people and communities are safeguarded.		support a requirement for numeric water quality states to be maintained.
Hill Country Farmers Group Submitter ID: 73321	PC1-7479	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to reflect in stream nitrogen concentrations consistent with the 95th percentile target in the National Objectives Framework. AND REMOVE Table 3.11-1 the E.coli numerical parameters flood condition and high flow conditions/events.	Support in part	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. FFNZ agrees that targets and measurements ought to exclude flood events or spikes and ensure anomalies do not distort results, targets and monitoring.
Hurley, Peter James Submitter ID: 71391	PC1-1086	Table 3.11-1: short term and long term numerical water quality targets	WITHDRAW PPC1 AND REPLACE with objectives, limits and targets that are achievable in terms of providing for the rivers life supporting capacity while ensuring the social and economic values of people and communities are safeguarded. AND MAKE any consequential amendments.	Support in part	FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ agrees that objectives, limits and targets need to be achievable and enable social and economic wellbeing.
Jivan Produce Ltd Submitter ID: 71429	PC1-1334	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to include attribute targets for sub-catchments.	Oppose in part	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. FFNZ considers that it is premature to include targets for sub-catchments and that this ought to be considered 10 years time when a stock take is undertaken and more information and better monitoring is available.
Jolly, Andrew Submitter ID: 71349	PC1-1261	Table 3.11-1: short term and long term numerical water quality targets	AMEND table 3.11-1 so that numerical targets account for events such as floods.	Support in part	FFNZ agrees that targets and measurements ought to exclude flood events or spikes and ensure anomalies do not distort results, targets and monitoring.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Kent and Gilbert, Elliot and Heather Submitter ID: 72891	PC1-5952	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 so that the water quality targets are achievable. AND AMEND Table 3.11-1 so that the numerical targets do not apply during flood events or when the parameter does not influence the value (i.e. apply when people swim or primary contact for cultural reasons).	Support in part	FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ agrees that objectives, limits and targets need to be achievable and enable social and economic wellbeing. FFNZ agrees that targets and measurements ought to exclude flood events or spikes and ensure anomalies do not distort results, targets and monitoring.
Lakes and Waterways Action Group Trust (LWAG) Submitter ID: 53342	PC1-4070	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to have regard to decisions on the Ministry for the Environment Clean Water package. AND AMEND to define 'swimmability'.	Support in part Oppose in part	FFNZ considers a reasonable definition of "swimmability" ought to be adopted to recognise only those sites and times of year where swimming occurs.
Lawson, John Submitter ID: 52942	PC1-11225	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to ensure that water quality is as a minimum maintained as required by RMA Section 30 (1) (c) (ii) and (iiia) AND AMEND PPC1 so that the threshold for water clarity, to measure swimmability is a minimum of 1.6m.	Oppose	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. It does not agree that clarity is a measure for swimmability or that it ought to be a minimum of 1.6m. FFNZ also considers that maintain ought to be maintain within a NOF band therefore does not support a requirement for numeric water quality states to be maintained.
Livingston, Adrienne Submitter ID: 74041	PC1-8491	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to include the following freshwater attribute: Te Hauora o te Taiao; natural character; dissolved oxygen (DO); deposited and suspended sediment; Freshwater Macroinvertebrate Health (MCI); periphyton; cyanobacteria; benthic	Oppose	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. FFNZ does not support amendments to include additional freshwater states for reasons including

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>cyanobacteria; Dissolved Inorganic Nitrogen (DIN) & total nitrogen in the tributaries/sub-catchments; total phosphorous in the tributaries/sub-catchments; temperature; pH; toxic heavy metals; barriers to fish migrations, and; water flows and levels.</p> <p>AND AMEND to provide for water quality targets that reflect the Ministry of Health's definition of swimmable and safe for food gathering.</p> <p>AND AMEND to include instream limits for loads, sediment loads, E.coli, toxic contaminant loads, micro-organisms and temperature.</p> <p>AND AMEND to provide for load thresholds in sub-catchments and catchments coming under resource use pressure. Load allocation should not reward current or historic poor practice but be equitable, promote efficient resource use, future proofed and promote sustainable management and based on the Land Use Classification and land suitability.</p>		<p>that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ does not agree with the submitter's assessment of or interpretation of the Vision & Strategy, ecosystem health, wetlands, rivers etc and considers that they do not reasonably provide for farming and will impose significant social, cultural and economic cost for uncertain environmental benefit and for no net benefit.</p> <p>FFNZ does not support the adoption of the total nitrogen, total phosphorous or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not support setting loads or limits for reasons including that this is likely to lead to or be used to justify an allocation approach, which FFNZ opposes (see FFNZ's submission on Variation 1).</p>
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9115	Table 3.11-1: short term and long term numerical water quality targets	<p>DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment</p> <p>AND CONSIDER undertaking a review of the 10-year numerical</p>	Oppose in part	<p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive or to retain them.</p> <p>FFNZ does not support amendments to include additional freshwater states for reasons including</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and sub-catchments AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.</p>		<p>that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ supports a proportionate approach but on the basis of numerical limits contained in Table 3.11-1 and these being used to determine property level reductions for reasons including that FFNZ opposes allocation and as further set out in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support the adoption of the total phosphorous or total nitrogen or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1).</p>
Maraekowhai Ltd Submitter ID: 73776	PC1-8859	Table 3.11-1: short term and long term numerical water quality targets	<p>AMEND Table 3.11-1 to ensure achievable water quality targets that provide for ecological health and cultural values as well as economic well-being for people and communities AND AMEND table 3.11-1 to ensure that the numerical targets do not apply during flood events or other inhospitable times when people</p>	Support in part	<p>FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ agrees that objectives, limits and targets need to be achievable and enable social and economic wellbeing.</p> <p>FFNZ agrees that targets and measurements ought to exclude flood events or spikes and times when</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			normally don't have primary contact with the water.		people do not have primary contact with water and ensure anomalies do not distort results, targets and monitoring.
Maunder, James Kinglsey Submitter ID: 71036	PC1-37	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to include an average value target for E.coli based on contact recreation unless there is scientific consensus against doing so. AND AMEND so that the target 95th percentile E.coli counts be lowered in line with the Ministry for the Environment recommended 'Surveillance' or 'Alert' levels unless there is scientific consensus against doing so.	Support in part Oppose in part	FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ considers that objectives, limits and targets need to be achievable and enable social and economic wellbeing. FFNZ considers that targets and measurements ought to exclude flood events or spikes and times when people do not have primary contact with water and ensure anomalies do not distort results, targets and monitoring. FFNZ would support the this submitters proposal to the extent that it provides for all of these matters (and further matters raised in its submission on Variation 1). However, without reviewing and analysis the effect to the proposed "average value target" for E coli, FFNZ cannot support it.
Maungatautari Marae Submitter ID: 73990	PC1-11725	Table 3.11-1: short term and long term numerical water quality targets	DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment AND CONSIDER undertaking a review of the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is	Oppose in part	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive or to retain them. FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>proportionate to the amount of current discharge AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and sub-catchments AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.</p>		<p>an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ supports a proportionate approach but on the basis of numerical limits contained in Table 3.11-1 and these being used to determine property level reductions for reasons including that FFNZ opposes allocation and as further set out in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support the adoption of the total phosphorous or total nitrogen or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1).</p>
Mayne, Anna Submitter ID: 72881	PC1-8981	Table 3.11-1: short term and long term numerical water quality targets	<p>AMEND PPC1 to ensure sheep and beef farms on hill country are planted in native species, following advice from local hapu, and that historical deforestation is replanted AND AMEND to enable farmers to make an income from native plantings through selective logging, selling seeds to local nurseries, and for use in Rongoa.</p>	Oppose in part	FFNZ considers that a tailored and proportionate approach ought to be adopted through FEPs based on MPA as opposed to a one size fits all or a blanket approach (see FFNZ's submission on Variation 1). Therefore, FFNZ does not support this submitters proposal to the extent that it is prescriptive and not tailored and pre-determines options reasonably available to farmers.
McGregor, Colin Grant Submitter ID: 73534	PC1-6650	Table 3.11-1: short term and long term numerical water quality targets	<p>WITHDRAW PPC1 and replace with objectives and numerical water quality limits/targets that consider the reality of the Waikato, are achievable, provide for the protection of its life</p>	Support in part	FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ agrees that objectives, limits

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			supporting capacity, and also ensure that the health and well-being, including social and economic values of people and communities, are safeguarded.		and targets need to be achievable and enable social and economic wellbeing.
McLaughlin, Kate Submitter ID: 72498	PC1-5979	Table 3.11-1: short term and long term numerical water quality targets	WITHDRAW PPC1 and REPLACE with objective and realistic numeric targets that the community can work towards together. AND AMEND the targets in Table 3.11-1 so they are set based on a numeric value of realistic and relevant goals specific to the Waikato and ensure that community social and economic expectations are not exceeded but achievable. AND AMEND the targets be flexible to account for uncontrolled environmental conditions such as flooding.	Support in part	FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ agrees that objectives, limits and targets need to be achievable and enable social and economic wellbeing. FFNZ agrees that targets and measurements ought to exclude flood events or spikes and ensure anomalies do not distort results, targets and monitoring.
McLean, Parekawhia Submitter ID: 73359	PC1-11874	Table 3.11-1: short term and long term numerical water quality targets	DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment AND CONSIDER undertaking a review of the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge AND RETAIN the 80-year numerical targets for E.coli and water clarity for	Oppose in part	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive or to retain them. FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>the Waikato River main stem and sub-catchments AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.</p>		<p>FFNZ supports a proportionate approach but on the basis of numerical limits contained in Table 3.11-1 and these being used to determine property level reductions for reasons including that FFNZ opposes allocation and as further set out in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support the adoption of the total phosphorous or total nitrogen or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1).</p>
Mercury NZ Limited Submitter ID: 73182	PC1-9679	Table 3.11-1: short term and long term numerical water quality targets	<p>RETAIN text under the heading of Table 3.11-1 regarding the intention of water quality targets not to be used as receiving water compliance limits/standards. AND AMEND to establish in Table 3.11-1 additional water quality target sites (monitoring sites) with corresponding short term and long term numerical targets, i.e. one sub-catchment area applying to each water quality target site. AND AMEND Table 3.11-2 and Map 3.11-2 to redefine sub-catchment areas in order to differentiate tributaries from the main stem of the Waikato River, particularly for the Upper Waikato River FMU. AND AMEND the redefined sub-catchment Map 3.11-2, and Table 3.11-1, to include additional sub-</p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ agrees that water quality targets should not to be used as receiving water compliance limits/standards.</p> <p>In principle, FFNZ sees the merit in additional water quality monitoring sites. However, FFNZ considers that further analysis is needed as to whether to include additional water quality monitoring sites and the location. FFNZ does not support the 80 year targets and considers that any targets ought to be 10 year targets but address the concerns FFNZ has with them (see FFNZ's submission on Variation 1).</p> <p>FFNZ is not sure about the implications of redefining sub-catchment areas and the impact on targets and monitoring. Therefore it cannot support this proposal at this time.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			catchment areas: corresponding to each hydro catchment, and any large tributaries entering the Waikato River within the Upper Waikato River FMU. [indicative map titled Additional Sub-Catchment Areas attached to the submission] AND AMEND to identify other tributary catchments as separate sub-catchments based on current land use and land cover.		
Murphy, William S Submitter ID: 72105	PC1-6461	Table 3.11-1: short term and long term numerical water quality targets	WITHDRAW PPC1 and replace with objectives and numerical water quality limits/targets that consider the reality of the Waikato, are achievable, provide for the protection of its life supporting capacity, and also ensure that the health and well-being, including social and economic values of people and communities, are safeguarded.	Support in part	FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ agrees that objectives, limits and targets need to be achievable and enable social and economic wellbeing.
Ngaati Tamaoho Trust Te Taiao Roopuu Submitter ID: 74088	PC1-11571	Table 3.11-1: short term and long term numerical water quality targets	DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment AND CONSIDER undertaking a review of the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge	Oppose in part	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive or to retain them. FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and sub-catchments</p> <p>AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only</p> <p>AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem</p> <p>AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.</p>		<p>FFNZ supports a proportionate approach but on the basis of numerical limits contained in Table 3.11-1 and these being used to determine property level reductions for reasons including that FFNZ opposes allocation and as further set out in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support the adoption of the total phosphorous or total nitrogen or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1).</p>
<p>Ngati Haua Iwi Trust Submitter ID: 73515</p>	<p>PC1-11824</p>	<p>Table 3.11-1: short term and long term numerical water quality targets</p>	<p>DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment</p> <p>AND CONSIDER undertaking a review of the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge</p> <p>AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and sub-catchments</p>	<p>Oppose in part</p>	<p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive or to retain them.</p> <p>FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ supports a proportionate approach but on the basis of numerical limits contained in Table 3.11-1 and these being used to determine property level</p>

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			<p>AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.</p>		<p>reductions for reasons including that FFNZ opposes allocation and as further set out in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support the adoption of the total phosphorous or total nitrogen or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1).</p>
<p>Parrott, Dorothy Fay, Peter Jack, Katherine and Conor Reeves Submitter ID: 73929</p>	<p>PC1-6703</p>	<p>Table 3.11-1: short term and long term numerical water quality targets</p>	<p>DELETE Table 3.11-1 in its entirety. OR AMEND by re-notifying the PPC1 when there are clear indications of what land use is required on farms within the future, with any consequential amendments arising from the submission process. AND AMEND by re-notifying only when there is a better system for measuring contaminant losses from farms, with any consequential amendments arising from the submission process. AND AMEND to ensure that PPC1 is adjusted to contain rules for the elimination of Koi Carp with any consequential amendments arising from the submission process.</p>	<p>Support in part Oppose in part</p>	<p>FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ considers that objectives, limits and targets need to be achievable and enable social and economic wellbeing. As explained in its submission on Variation 1, FFNZ sees merit in 10 year targets to measure progress but is concerned that the 10 year targets suffer the same flaws as the 80 year targets and would support an alternative way of defining them that was more appropriate, reasonable, practical and affordable.</p> <p>FFNZ is not sure what is meant by the proposal about indications about what land use is required on farms but FFNZ considers it in appropriate to adopt a blanket and prescriptive approach and considers that tailored and proportionate actions through FEPs that identify critical source areas and use MPA to define mitigations (see FFNZ's submission</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					on Variation 1). FFNZ would also not support an LUC or LUS or any approach that involved allocation or determining land use change.
Poohara Marae Submitter ID: 73545	PC1-11999	Table 3.11-1: short term and long term numerical water quality targets	DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment AND CONSIDER undertaking a review of the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and sub-catchments AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.	Oppose in part	<p>FFNZ does not support the 80 year numeric targets (see FFNZ’s submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive or to retain them.</p> <p>FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ supports a proportionate approach but on the basis of numerical limits contained in Table 3.11-1 and these being used to determine property level reductions for reasons including that FFNZ opposes allocation and as further set out in FFNZ’s submission on Variation 1.</p> <p>FFNZ does not support the adoption of the total phosphorous or total nitrogen or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ’s submission on Variation 1).</p>

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Potini Whaanau Submitter ID: 74089	PC1-11672	Table 3.11-1: short term and long term numerical water quality targets	DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment AND CONSIDER undertaking a review of the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and sub-catchments AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.	Oppose in part	<p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive or to retain them.</p> <p>FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ supports a proportionate approach but on the basis of numerical limits contained in Table 3.11-1 and these being used to determine property level reductions for reasons including that FFNZ opposes allocation and as further set out in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support the adoption of the total phosphorous or total nitrogen or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1).</p>
R.P O'Connor and Sons Ltd	PC1-6937	Table 3.11-1: short term and long term	AMEND Table 3.11-1 so the water quality targets are realistic, achievable, and allow for	Support in part	FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 71651		numerical water quality targets	environmental, natural and seasonal weather changes as well as farming and community survivability. AND AMEND Table 3.11-1 so the numerical targets do not apply during flood events. AND AMEND PPC1 so that water samples are taken from rivers below Taupo before and after each town and/or city catchment to account for possible pollution from urban areas.		<p>Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ agrees that objectives, limits and targets need to be achievable and enable social and economic wellbeing. As explained in its submission on Variation 1, FFNZ sees merit in 10 year targets to measure progress but is concerned that the 10 year targets suffer the same flaws as the 80 year targets and would support an alternative way of defining them that was more appropriate, reasonable, practical and affordable.</p> <p>FFNZ agrees that targets and measurements ought to exclude flood events or spikes and ensure anomalies do not distort results, targets and monitoring. FFNZ also agrees that the effects of townships needs to be taken into account either by excluding them through the monitoring sites selected or by including them as part of the solution to addressing water quality (FFNZ supports the latter approach).</p>
Raukawa Charitable Trust Submitter ID: 74073	PC1-10578	Table 3.11-1: short term and long term numerical water quality targets	DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment. AND review the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge. AND RETAIN the 80-year numerical targets for E.coli and water clarity for	Oppose in part	<p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive or to retain them.</p> <p>FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>the Waikato River main stem and sub-catchments. AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only. AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem. AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.</p>		<p>FFNZ supports a proportionate approach but on the basis of numerical limits contained in Table 3.11-1 and these being used to determine property level reductions for reasons including that FFNZ opposes allocation and as further set out in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support the adoption of the total phosphorous or total nitrogen or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1).</p>
<p>Ravenscroft, Michael and Clare Submitter ID: 71223</p>	<p>PC1-1549</p>	<p>Table 3.11-1: short term and long term numerical water quality targets</p>	<p>AMEND Table 3.11-1 to include data from testing sites close to all settlements in catchments of 200 or more people where the settlement has buildings less than 1 km from a catchment waterway. Include any consequential amendments. AND AMEND Table 3.11-1 to include phosphorous levels/targets and to allow for data gathering. Include any consequential amendments.</p>	<p>Support in part Oppose in part</p>	<p>In principle, FFNZ considers that the impacts of all activities on water quality and sources of contaminants need to be understood, including pests, natural sources and townships. However, FFNZ considers that the most appropriate monitoring sites need to be understood and this may not necessarily be as suggested by this submitter.</p> <p>FFNZ is also concerns that it is inappropriate to adopt a total phosphorous target based on lake metrics and in the absence of a NOF target, it may be appropriate to develop something specific provided it is reasonable, practical and affordable (see FFNZ's submission Variation 1). The appropriate time to do this is likely to be in 10 years at the "stock take" time that FFNZ considers ought</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					to happen to understand improvements, science and information gathered.
Ravensdown Limited Submitter ID: 74058	PC1-10213	Table 3.11-1: short term and long term numerical water quality targets	CLARIFY in PPC1 how the 10% change in water quality will be determined.	Support in part	FFNZ agrees that clarity around 10% improvement is required and refers to the concerns it sets out in its submission on Variation 1 about the 10 year targets being derived from flawed 80 year targets. FFNZ also considers that maintain ought to be within a band and that attributes within A band ought to not be required to improve by 10%.
Reese, Kate and Aaron Submitter ID: 72961	PC1-7849	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to include current attribute values for immediate comparison to target values. AND AMEND to include the National Bottom Line values and explain why the target values are higher in PPC1. AND AMEND to include a definition for 'short term' or replace 'short term' with '10 year'. AND AMEND to explain why there are no values for chlorophyll, nitrogen and phosphorus for most Freshwater Management Units, and include the values if they are available. AND AMEND to include the monitoring location for each Freshwater Management Unit. AND AMEND to bring the values in line with National Bottom Line values or just above.	Support in part Oppose in part	FFNZ agrees that current states ought to be included in Table 3.11-1 but also considers the 80 year targets ought to be deleted and 10 year targets ought to be amended (see FFNZ's submission on Variation 1). FFNZ agrees that that targets ought to be based on the NOF framework, national bottom lines and maintain ought to be within a band. FFNZ opposes the adoption of TP and TN targets on the basis that these are lake metrics, the river is a modified watercourse with hydro dams and townships, the lake metric is too strict and an approach that is appropriate for this kind of river ought to be adopted. Therefore FFNZ opposes any proposal to adopt TP and TN targets for any part of the catchment.
Roberts, Jessica Submitter ID: 74141	PC1-12322	Table 3.11-1: short term and long term numerical water quality targets	AMEND PPC1 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments. AND REMOVE flood/high flow conditions from water quality target data.	Support in part Oppose in part	FFNZ agrees that all source of contaminants need to be addressed. FFNZ considers that targets and measurements ought to exclude flood events or spikes and ensure anomalies do not distort results, targets and monitoring.

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			AND AMEND to address contaminants on a sub-catchment basis to enable targeting of the highest omitting sub-catchments.		FFNZ considers that a sub-catchment approach based on the catchment profiles proposed in its submission on Variation 1 ought to be adopted and would not support an approach that involved allocating sub-catchment numbers to property level or on requiring highest emitters to reduce without properly understanding the reasons (for this reason FFNZ supports tailored and proportionate FEPs that address critical source areas using MPA – see FFNZ's submission on Variation 1).
Rowe, Susan Helen Submitter ID: 72588	PC1-6732	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 so the quality of the water is achievable.	Support	FFNZ agrees that the targets ought to be reasonable, practical, affordable and achievable. For these reasons it considers the 80 year targets ought to be deleted and reasonable 10 year targets adopted (see FFNZ's submission on Variation 1).
Simpson, Trevor Andrew Submitter ID: 67472	PC1-10924	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to use a medium percentile figure for E.coli and Nitrate targets AND AMEND to use the Waikato River Authority's interpretation of swimmability.	Support in part Oppose in part	FFNZ opposes the adoption of TP and TN targets on the basis that these are lake metrics, the river is a modified watercourse with hydro dams and townships, the lake metric is too strict and an approach that is appropriate for this kind of river ought to be adopted. FFNZ would support an medium approach to N and E coli if that was more reasonable targets but considers that further changes are likely to be needed so that targets and measurements exclude flood events or spikes and ensure anomalies do not distort results, targets and monitoring. FFNZ considers that any definition of swimmability ought to be reasonable, practical and affordable and take into account the places and times of year that the rivers are swim in.
Southern Pastures Limited Partnership	PC1-11198	Table 3.11-1: short term and long term	AMEND Table 3.11-1 so that the provisions clearly set out how the attributes in Table 3.11-1 will be	Support in part	FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74062		numerical water quality targets	implemented, particularly in the context of resource consent applications for farming activities. AND grant relief sought regarding land use change, land use flexibility and off-set mitigation, as detailed elsewhere in the submission.		<p>Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ agrees that objectives, limits and targets need to be achievable and enable social and economic wellbeing. As explained in its submission on Variation 1, FFNZ sees merit in 10 year targets to measure progress but is concerned that the 10 year targets suffer the same flaws as the 80 year targets and would support an alternative way of defining them that was more appropriate, reasonable, practical and affordable.</p> <p>FFNZ considers that Catchment Profiles ought to be used to inform tailored actions in FEPs to address critical source areas using FFNZ's MPA framework (see FFNZ's submission on Variation 1).</p> <p>FFNZ agrees that a flexible, proportionate, tailored approach ought to be adopted that provides for land use change and offsets.</p>
Stark, Steven and Theresa Submitter ID: 73721	PC1-5032	Table 3.11-1: short term and long term numerical water quality targets	DELETE Table 3.11-1 and substitute the minimum standards as set out in the Ministry for the Environment's <i>Clean Water</i> document published February 2017 and within the National Objectives Framework in the National Policy Statement for Freshwater Management 2014. AND AMEND by allowing movement of water quality within a band. AND AMEND so standards do not have to be upheld during flood events.	Support in part	<p>FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ agrees that objectives, limits and targets need to be achievable and enable social and economic wellbeing. As explained in its submission on Variation 1, FFNZ sees merit in 10 year targets to measure progress but is concerned that the 10 year targets suffer the same flaws as the 80 year targets and would support an alternative way of defining them that was more appropriate, reasonable, practical and affordable.</p> <p>FFNZ supports maintain within a NPF band. FFNZ agrees that targets and measurements ought to exclude flood events or spikes and ensure</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					anomalies do not distort results, targets and monitoring.
Stokman, Mark and Sharon Submitter ID: 73976	PC1-6692	Table 3.11-1: short term and long term numerical water quality targets	WITHDRAW PPC1 and replace with objectives and numerical water quality limits/targets that consider the reality of the Waikato, are achievable, provide for the protection of its life supporting capacity, and also ensure that the health and well-being, including social and economic values of people and communities, are safeguarded.	Support in part	FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ agrees that objectives, limits and targets need to be achievable and enable social and economic wellbeing. As explained in its submission on Variation 1, FFNZ sees merit in 10 year targets to measure progress but is concerned that the 10 year targets suffer the same flaws as the 80 year targets and would support an alternative way of defining them that was more appropriate, reasonable, practical and affordable.
Taupo District Council Submitter ID: 74207	PC1-8170	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to accurately label the table number reference on each page AND AMEND to include a map illustrating the location of the monitoring sites.	Oppose in part	<p>FFNZ considers that Table 3.11-1 requires significant amendment.</p> <p>FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ agrees that objectives, limits and targets need to be achievable and enable social and economic wellbeing. As explained in its submission on Variation 1, FFNZ sees merit in 10 year targets to measure progress but is concerned that the 10 year targets suffer the same flaws as the 80 year targets and would support an alternative way of defining them that was more appropriate, reasonable, practical and affordable.</p> <p>The submitter's proposed changes do not address this. But FFNZ would support identifying monitoring sites and consideration of the location of appropriate and reasonable monitoring sites.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11773	Table 3.11-1: short term and long term numerical water quality targets	DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment. AND review the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge. AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and sub-catchments. AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only. AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem. AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.	Oppose in part	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive or to retain them. FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit. FFNZ supports a proportionate approach but on the basis of numerical limits contained in Table 3.11-1 and these being used to determine property level reductions for reasons including that FFNZ opposes allocation and as further set out in FFNZ's submission on Variation 1. FFNZ does not support the adoption of the total phosphorous or total nitrogen or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1).
Te Miro Farms Partnership	PC1-6884	Table 3.11-1: short term and long term	AMEND Table 3.11-1 so that the water quality targets are achievable.	Support in part	FFNZ does not support the 80 year numeric targets and considers they ought to be deleted and a narrative approach adopted for the values and

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 72893		numerical water quality targets	AMEND Table 3.11-1 so the water quality targets provide for the ecological health, and cultural values of water bodies, as well as the social and economic well-being of people and communities. AND AMEND Table 3.11-1 so the numerical targets do not apply during flood events or when they are unlikely to be used, eg during winter months.		<p>Vision & Strategy (see FFNZ's submission on Variation 1). FFNZ agrees that objectives, limits and targets need to be achievable and enable social and economic wellbeing. As explained in its submission on Variation 1, FFNZ sees merit in 10 year targets to measure progress but is concerned that the 10 year targets suffer the same flaws as the 80 year targets and would support an alternative way of defining them that was more appropriate, reasonable, practical and affordable.</p> <p>FFNZ agrees that targets and measurements ought to exclude flood events or spikes, account for and apply to sites and times of years that swimming occurs, and ensure anomalies do not distort results, targets and monitoring.</p>
Timberlands Limited Submitter ID: 73036	PC1-4063	Table 3.11-1: short term and long term numerical water quality targets	AMEND Objective 1 by expressing the 80 year numerical attribute targets for nitrogen as a single set of TN numerical attribute targets measured in the main stem of the Waikato River at the bottom of each Freshwater Management Unit. AND AMEND by revising the 10 year numerical nitrogen attribute targets to show greater consistency between sub-catchment loads, making sure that the degree of reduction required is proportionate to the amount of current discharge.	Oppose	<p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive.</p> <p>FFNZ opposes the adoption of TP and TN targets on the basis that these are lake metrics, the river is a modified watercourse with hydro dams and townships, the lake metric is too strict and an approach that is appropriate for this kind of river ought to be adopted. Therefore FFNZ opposes any proposal to adopt TP and TN targets for any part of the catchment.</p> <p>FFNZ does not support linking targets to sub-catchment loads or to reductions in discharges from properties for reasons including that this is likely to result in or effectively is an allocation approach. FFNZ does not support allocation and refers to its submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10257	Table 3.11-1: short term and long term numerical water quality targets	<p>DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment.</p> <p>AND review the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge.</p> <p>AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and sub-catchments.</p> <p>AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only.</p> <p>AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem.</p> <p>AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.</p>	Oppose in part	<p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive or to retain them.</p> <p>FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ supports a proportionate approach but on the basis of numerical limits contained in Table 3.11-1 and these being used to determine property level reductions for reasons including that FFNZ opposes allocation and as further set out in FFNZ's submission on Variation 1.</p> <p>FFNZ does not support the adoption of the total phosphorous or total nitrogen or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1).</p>
Verry, Reon and Wendy	PC1-3994	Table 3.11-1: short term and long term	AMEND to provide data that measures contaminants at	Support in part	FFNZ agrees that reasonable and appropriate monitoring sites ought to be investigated and adopted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 72887		numerical water quality targets	<p>meaningful locations to narrow down sources.</p> <p>AND AMEND E.coli targets throughout the table to allow for flood events.</p> <p>AND AMEND to ensure consistency with targets and/or better explanations around the targets.</p> <p>AND AMEND to provide complete data table, with relevant explanations.</p> <p>AND AMEND so that all contaminants allow for a cost benefit analysis at the sub-catchment level rather than application of the blanket nitrogen and stock exclusion rules.</p>		<p>FFNZ agrees that targets and measurements ought to exclude flood events or spikes and ensure anomalies do not distort results, targets and monitoring.</p> <p>FFNZ supports an approach that is consistent and consistent with the NPS-FM and terminology used therein.</p> <p>FFNZ supports a cost benefit analysis approach, tailored actions and as further explained in its submission on Variation 1. It agrees that a blanket approach, including to stock exclusion, is not appropriate.</p>
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3250	Table 3.11-1: short term and long term numerical water quality targets	<p>DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment</p> <p>AND review the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge</p> <p>AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and sub-catchments</p> <p>AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only</p>	Oppose in part	<p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive or to retain them.</p> <p>FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ supports a proportionate approach but on the basis of numerical limits contained in Table 3.11-1 and these being used to determine property level reductions for reasons including that FFNZ opposes allocation and as further set out in FFNZ's submission on Variation 1.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem</p> <p>AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.</p>		<p>FFNZ does not support the adoption of the total phosphorous or total nitrogen or lake metric for reasons including that it is significantly more stringent than the river metric, does not reflect the fact the river is a highly modified water course with hydro dams and townships and will impose significant cost for no net benefit (see FFNZ's submission on Variation 1).</p>
<p>Waikato Environment Centre Submitter ID: 73436</p>	<p>PC1-6231</p>	<p>Table 3.11-1: short term and long term numerical water quality targets</p>	<p>AMEND Table 3.11-1 to provide for a reduction in desired discharge levels and targets in order to achieve the community and Plan Vision.</p> <p>AND AMEND to provide for water quality targets that reflect the Ministry of Health's definition of swimmable and safe for food gathering.</p> <p>AND AMEND to include the following freshwater attribute: Te Hauora o te Taiao; natural character; dissolved oxygen (DO); deposited and suspended sediment; Freshwater Macroinvertebrate Health (MCI); periphyton; cyanobacteria; benthic cyanobacteria; Dissolved Inorganic Nitrogen (DIN) & total nitrogen in the tributaries/sub-catchments; total phosphorous in the tributaries/sub-catchments; temperature; pH; toxic heavy metals; barriers to fish migrations, and; water flows and levels.</p>	<p>Oppose</p>	<p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive.</p> <p>FFNZ also considers that maintain ought to be maintain within a NOF band therefore does not support a requirement for numeric water quality states to be maintained.</p> <p>FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ does not agree with the submitter's assessment of or interpretation of the Vision & Strategy, ecosystem health, wetlands, rivers etc and considers that they do not reasonably provide for</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND to include instream limits for loads, sediment loads, E.coli, toxic contaminant loads, micro-organisms and temperature.</p> <p>AND AMEND to provide for load thresholds in sub-catchments and catchments coming under resource use pressure.</p>		<p>farming and will impose significant social, cultural and economic cost for uncertain environmental benefit and for no net benefit.</p> <p>FFNZ does not support a load or threshold approach for reasons including that this is likely to result in or is effectively an allocation approach and FFNZ does not support allocation (see FFNZ's submission on Variation 1).</p>
<p>Waikato Regional Council Submitter ID: 72890</p>	<p>PC1-3635</p>	<p>Table 3.11-1: short term and long term numerical water quality targets</p>	<p>AMEND Table 3.11-1: Dune, Riverine, Volcanic and Peat Lakes freshwater Management Units on page 67, by adding two new columns to provide targets for Annual Median and Annual Maximum Ammonia as per NPSFM - Band C for 80 year target</p> <p>AND AMEND Table 3.11-1 by adding a footnote to read: "<u>that the annual median and annual maximum ammonia have been adjusted for pH.</u>"</p> <p>AND AMEND either the Methods or Table 3.11-1 Explanatory note to Table 3.11-1 to get alignment between the attribute Clarity in Table 3.11-1 and references to sediment in the Methods</p> <p>AND AMEND Table 3.11-1 to combine the three tables into one table, OR provide different captions and individual numbering for each table</p> <p>AND AMEND to place the table caption directly above the table</p>	<p>Oppose in part</p>	<p>FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive.</p> <p>FFNZ also considers that maintain ought to be maintain within a NOF band therefore does not support a requirement for numeric water quality states to be maintained.</p> <p>FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit.</p> <p>FFNZ considers that further consideration needs to be given to the appropriate spatial scale for freshwater management, including for volcanic lakes (see FFNZ's submission on Variation 1) but cannot form a view of on the proposed amendments without seeing the implications and therefore do not support them at this time.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND Table 3.11-1 to read: “Waerenga Stm SH2 Maramarua Taniwha Rd.”</p> <p>AND AMEND to rename Lake Opouri as Lake Ngapouri in Table 3.11-1 Dune, Riverine, Volcanic and Peat Lakes Freshwater Management Units (last section, on page 67, list the names of the lakes and their catchments, as is the case for all other entries in the table</p> <p>AND AMEND Table 3.11-1 to take into account the Bay of Plenty Regional Council water quality standards for those parts of the Waikato and Waipā River Catchment area that overlap with and drain into the Lake Rotorua Catchment</p> <p>AND AMEND to rename the Volcanic Lake category in a way that is relevant to some aspect of the character of the lakes in the category.</p>		
<p>Waikato River Authority Submitter ID: 74033</p>	<p>PC1-11559</p>	<p>Table 3.11-1: short term and long term numerical water quality targets</p>	<p>AMEND Table 3.11-1 so that as a minimum, limits are set at current contaminant levels for all sub-catchments along with a clear directive that these contaminant levels shall not increase.</p>	<p>Oppose</p>	<p>FFNZ does not support the 80 year numeric targets (see FFNZ’s submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. As explained in its submission on Variation 1, FFNZ sees merit in 10 year targets to measure progress but is concerned that the 10 year targets suffer the same flaws as the 80 year targets and would support an alternative way of defining them that was more appropriate, reasonable, practical and affordable.</p> <p>FFNZ also considers that maintain ought to be maintain within a NOF band therefore does not</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					support a requirement for numeric water quality states to be maintained.
Waipa District Council Submitter ID: 67704	PC1-3238	Table 3.11-1: short term and long term numerical water quality targets	ADD the table number (3.11-1) in the title of the table on page 57 AND ADD a definition of 'short term' in Table 3.11-1 as 'by 2026' AND ADD a map identifying the locations of the monitoring sites in Table 3.11-1 AND ADD an explanation of gaps in the data in the table AND CLARIFY how water quality impacts of flooding are addressed in the targets.	Oppose in part	As explained in its submission on Variation 1, FFNZ sees merit in 10 year targets to measure progress but is concerned that the 10 year targets suffer the same flaws as the 80 year targets and would support an alternative way of defining them that was more appropriate, reasonable, practical and affordable. FFNZ also considers timeframes for 10 year targets need to be amended in light of the delay since notification of PC1 (see FFNZ's submission on Variation 1). FFNZ agrees that targets and measurements ought to exclude flood events or spikes and ensure anomalies do not distort results, targets and monitoring.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11391	Table 3.11-1: short term and long term numerical water quality targets	AMEND PPC1 to use consistent cross-referencing to the freshwater objectives in the National Policy Statement for Freshwater 2014. AND AMEND Table 3.11-1 to include a new first column which identifies and links the sub-catchment name with the relevant sub-catchment number as shown in Appendix C of the submission. AND AMEND to substitute the short-term and long-term numerical freshwater objectives for sub-catchments 56, 58, 59, 62, 65, 66B, 72, 73 and 74 with the alternative freshwater objectives in Appendix C of the submission. AND AMEND to insert an additional row to provide freshwater objectives	Support in part Oppose in part	FFNZ agrees that the approach ought to be consistent with the NPS-FM both in terms of targets, process and terminology. However, there also ought to be sufficient tailoring to recognise the particular characteristics of the catchment e.g. hydro dams, geography, historical events like slips etc. FFNZ does not support substituting short term and long term numerical targets on the basis it does not support the 80 year targets and without understanding the impacts for these sub-catchments and elsewhere in the catchment it cannot support them. For the same reasons it does not support the proposed freshwater objectives.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			for sub-catchment 66A (Tahorakuri) as shown in Appendix C of the submission.		
Waitomo District Council Submitter ID: 73688	PC1-10848	Table 3.11-1: short term and long term numerical water quality targets	AMEND Table 3.11-1 to include its number (3.11-1) in the title of the table AND ADD a definition of 'short term' as 'by 2026' AND ADD a map identifying the locations of the monitoring sites in Table 3.11-1 AND ensure appropriate account has been taken in setting the E.coli limits to make allowance for peak flooding events AND CLARIFY how phosphorus is being measured in the Waipā Freshwater Management Unit.	Oppose in part	As explained in its submission on Variation 1, FFNZ sees merit in 10 year targets to measure progress but is concerned that the 10 year targets suffer the same flaws as the 80 year targets and would support an alternative way of defining them that was more appropriate, reasonable, practical and affordable. FFNZ also considers timeframes for 10 year targets need to be amended in light of the delay since notification of PC1 (see FFNZ's submission on Variation 1). FFNZ agrees that targets and measurements ought to exclude flood events or spikes and ensure anomalies do not distort results, targets and monitoring. FFNZ opposes the adoption of TP and TN targets on the basis that these are lake metrics, the river is a modified watercourse with hydro dams and townships, the lake metric is too strict and an approach that is appropriate for this kind of river ought to be adopted. Therefore FFNZ opposes any proposal to adopt TP and TN targets for any part of the catchment. In respect of Waipa, FFNZ considers that the implications of historical events like slips and natural sources of phosphorous need to be understood before adopting targets and considers that this can be considered during the stocktake in 10 years that FFNZ considers ought to happen (see FFNZ's submission on Variation 1).
Watercare Services Ltd	PC1-8435	Table 3.11-1: short term and long term	AMEND Table 3.11-1/PPC1 to recognise the seasonality effects of point source discharges as is current	Support in part	FFNZ considers that seasonality effects ought to be considered for all discharges not just point source.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74077		numerical water quality targets	practice with many existing discharge consents to the Waikato River AND CLARIFY how historical water quality data has been handled to derive water quality targets for ammonia and the implication for addressing effects of point source discharges AND AMEND in Table 3.11-1 the long term water quality targets for Total Nitrogen, Total Phosphorus and Chlorophyll-a to recognise the gradual deterioration of water quality along the length of the Waikato River and the artificial boundaries between the upper and lower catchment be removed.	Oppose in part	FFNZ considers that historical data needs to be considered for all discharges not just point source. FFNZ considers that the 80 year numeric targets ought to be deleted (see FFNZ's submission on Variation 1) but agrees that targets ought to take into account the gradual deterioration downstream and provide for the fact the river is highly modified with things like townships and hydro dams and the impact of these on water quality.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11005	Table 3.11-2: list of sub-catchments showing priority	AMEND Table 3.11-2 to adopt the amendments sought in the table in Appendix 1 of the submission (pages 69 to 74) AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2.	Oppose	FFNZ does not support the amendments sought by the submitter in Appendix 1 for reasons including that they will do not reasonably provide for farming activities and will impose significant cost for no net benefit.
Bailey, James Submitter ID: 73926	PC1-9051	Table 3.11-2: list of sub-catchments showing priority	AMEND Table 3.11-2 to make stock exclusion consistent with central Government's recommendations being proposed through the advice of the Land and Water Forum AND AMEND to place a strong emphasis on identifying and addressing critical source areas through the farm planning process AND AMEND to use the sub-catchment approach by incentivising	Support in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			the development of catchment groups to work alongside Council to identify and target contaminant hot spots.		<p>FFNZ is concerned that there are no national stock exclusion requirements and the draft regulations had several issues including the practicality and uncertainty around determining slope. FFNZ prefers an approach that is not based on slope but instead based on stock units or a narrative approach (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports tailored and proportionate FEPs with mitigations based on a critical source area assessment and applying the MPA framework set out in FFNZ's submission on Variation 1.</p> <p>FFNZ supports a sub-catchment approach through the tailoring of FEPs to catchment profiles and non regulatory sub-catchment plans (FFNZ refers to its submission on Variation 1). However, FFNZ does not support the establishment of catchment collectives if they are provided with autonomy to allocate contaminants and/or self regulate.</p>
Department of Conservation Submitter ID: 71759	PC1-11067	Table 3.11-2: list of sub-catchments showing priority	AMEND Table 3.11-2 so that all wetland and lake sub-catchments are included as Priority 1. AND AMEND Table 3.11-2 to recognise the existing works that have already been undertaken for lakes by way of lake restoration plans and farm environment/management plans, AND ensure that the Table reflects the need for their immediate implementation and enforcement [refer Appendix J of the submission - Existing Lakes Management and Planning].	Oppose in part	<p>FFNZ does not support the prioritisation approach in Table 3.11-2 and refers to its submission on Variation 1. FFNZ prefers a tailored approach to lakes and wetlands through the proposed methods and gaining better understanding of them over the next 10 years and therefore does not support the proposal to make them a priority 1.</p> <p>FFNZ agrees that existing work ought to be recognised and provided for.</p> <p>FFNZ oppose amendments to require immediate implementation and enforcement for reasons including that a pragmatic approach to enforcement is required, insufficient information is currently</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND to insert Pungarehu Canal/Stream to Table 3.11-2 as Priority 1.</p> <p>AND AMEND Table 3.11-2 so that the identified lakes in Appendix H of the submission [see Appendix H of the submission] be actioned within 1-2 years of PPC1 being made operative, with the management of the remainder of the lakes being actioned within 5 years from the date of the PPC1 being made operative.</p> <p>AND review sub-catchments to ensure they are appropriate for the holistic management of individual lakes through individual Freshwater Management Units.</p>		<p>available, a gradual and tailored approach is required and as otherwise explained in FFNZ's submission on Variation 1.</p> <p>FFNZ opposes inserting Pungarehu canal/stream as a priority .</p> <p>FFNZ opposes adopting Appendix H or the proposed timeframes for reasons including that this does not recognise the lack of understanding of the lakes, does not reasonably provide for farming and will impose significant cost for no net benefit.</p> <p>FFNZ has concerns that the FMUs are not the appropriate spatial scale and considers they ought to be reviewed. FFNZ agrees that a holistic approach is needed to look at all sources of water quality issues, not just farming activities.</p>
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4465	Table 3.11-2: list of sub-catchments showing priority	<p>AMEND PPC1 to protect remaining wetlands and gully seeps and create new incentives to encourage the creation or reinstatement of wetland areas.</p> <p>AND RETAIN PPC1 in its entirety.</p> <p>AND RETAIN Mangakotukutuku Stream Catchment (No. 30) as a Priority 1 catchment.</p>	Oppose	FFNZ considers that a tailored and proportionate approach is needed and does not support a blanket approach to wetlands and gullies (see FFNZ's submission on Variation 1). FFNZ consider that PC1 requires substantial amendment as set out in its submission on Variation 1.
Mercury NZ Limited Submitter ID: 73182	PC1-9680	Table 3.11-2: list of sub-catchments showing priority	<p>ADD to Table 3.11-2 an explanatory to confirm that Lakes Freshwater Management Units are included in sub-catchment areas.</p> <p>AND AMEND and redefine sub-catchment areas listed in Table 3.11-2 and mapped on Map 3.11-2 to differentiate tributaries from the main stem of the Waikato River,</p>	Oppose in part	FFNZ considers that the lake FMUs require further consideration as do the river FMUs including as to whether they are the appropriate spatial scale for water management and appropriate for calculation of the 75 th percentile (see FFNZ's submission on Variation 1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			particularly for the Upper Waikato River FMU.		FFNZ considers that the sub-catchments need to be revisited but cannot support the submitter's proposal without understanding the implications.
Waikato Regional Council Submitter ID: 72890	PC1-3646	Table 3.11-2: list of sub-catchments showing priority	RETAIN Table 3.11-2 AND DELETE from "Table 3.11-2 (p70): Table 3.11-2: List of sub-catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments " AND AMEND Map 3.11-2 and Table 3.11-2 to combine Priority 1 sub-catchment 52 (Waitomo at Tumutumu Road) with Priority 2 sub-catchment 46 (Waitomo at SH31 Otorohanga) AND AMEND add to the list in Table 3.11-2 the combined area as: 'Waitomo catchment', 'Priority 1'.	Oppose in part	As set out in FFNZ's submission on Variation 1, FFNZ has concerns with the prioritisation approach and considers that amendments are required.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11395	Table 3.11-2: list of sub-catchments showing priority	DELETE from Table 3.11-2 the row pertaining to sub-catchment 66 AND ADD two new rows to list sub-catchments 66A (Tahorakuri) and 66B (Ohakuri) as priority 3 sub-catchments.	Oppose in part	As set out in FFNZ's submission on Variation 1, FFNZ has concerns with the prioritisation approach and considers that amendments are required. It cannot support the submitter's proposal without understanding how this impacts on the issues regarding prioritisation or on sub-catchments downstream.
Central Waikato Zone Committee Submitter ID: 74028	PC1-7587	Map 3.11-2: Map showing catchments	AMEND Map 3.11-2 by changing sub-catchment 32, Karapiro, from Priority 3 to 1 (Yellow to Red on the map).	Oppose in part	As set out in FFNZ's submission on Variation 1, FFNZ has concerns with the prioritisation approach and considers that amendments are required. It cannot support the submitter's proposal without understanding how this impacts on the issues regarding prioritisation or on sub-catchments downstream.
Cowan, Evan John Submitter ID: 73808	PC1-2810	Map 3.11-2: Map showing catchments	RETAIN Schedule C stock exclusion stock from rivers, drains, Lakes and significant wetlands.	Support in part	FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. However, FFNZ considers that Schedule C requires substantial amendment.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to provide for a collaborative approach to developing individual Farm Environment Plans that reduce reliance on stock exclusion through fencing.	Oppose in part	FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation.
Gleeson, Graeme B Submitter ID: 73800	PC1-6446	Map 3.11-2: Map showing catchments	AMEND maps so that Lake Taupo is acknowledged as a headwater sub-catchment, and that water from Lake Taupo is maintained in the best state possible as it flows down the Waikato River. AND AMEND to ensure monitoring of water quality is such that dilution from cleaner Lake Taupo water does not hide the effect of poor quality tributaries.	Oppose in part	FFNZ is concerned that the numeric water quality targets are already too stringent and impose significant cost (see FFNZ's submission on Variation 1). Therefore, FFNZ opposes this submission point on the basis that they are likely to make them more stringent and does not appear to allow for or address things like hydro dams, townships and natural sources of contaminants that affect water quality along the river.
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4467	Map 3.11-2: Map showing catchments	AMEND PPC1 to protect remaining wetlands and gully seeps and create new incentives to encourage the creation or reinstatement of wetland areas. AND RETAIN PPC1 in its entirety. AND RETAIN Mangakotukutuku Stream Catchment (No. 30) as a Priority 1 catchment.	Oppose	FFNZ considers that a tailored and proportionate approach is needed and does not support a blanket approach to wetlands and gullies (see FFNZ's submission on Variation 1). FFNZ consider that PC1 requires substantial amendment as set out in its submission on Variation 1.
Mercury NZ Limited Submitter ID: 73182	PC1-9681	Map 3.11-2: Map showing catchments	AMEND Map 3.11-2 to redefine sub-catchment areas listed in Table 3.11-2 and mapped on Map 3.11-2 to differentiate tributaries from the main stem of the Waikato River,	Oppose in part	FFNZ considers that the lake FMUs require further consideration as do the river FMUs including as to whether they are the appropriate spatial scale for water management and appropriate for calculation of the 75 th percentile (see FFNZ's submission on Variation 1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			particularly for the Upper Waikato River Freshwater Management Unit AND AMEND Map 3.11-3 to the redefined sub-catchment areas and include the following additional sub-catchment areas: corresponding to each hydro catchment, and any large tributaries entering the Waikato River within the Upper Waikato River FMU [indicative map titled Additional Sub-Catchment Areas attached to the submission] AND AMEND Map 3.11-2 such that sub-catchments within an FMU are numbered consecutively for ease of referencing.		FFNZ considers that the sub-catchments need to be revisited but cannot support the submitter's proposal without understanding the implications. FFNZ might support the amendments if they appropriately reflected the hydro dams and impacts on water quality.
TIM Nominees Submitter ID: 73964	PC1-8440	Map 3.11-2: Map showing catchments	CLARIFY whether Map 3.11-2 and associated provisions apply to the urban environment, and if so, clearly explain how.	Support in part	FFNZ considers that PC1 (including water quality targets and maps) ought to apply to, provide for and address all sources of contaminants, not just diffuse discharges. To the extent that this submission point provides for this, FFNZ supports it.
Waikato Regional Council Submitter ID: 72890	PC1-3651	Map 3.11-2: Map showing catchments	AMEND Map 3.11-2 by adding a comment to state that sub-catchment plans can include a multiple sub-catchment approach. AND AMEND Map 3.11-2 and Table 3.11-2 to combine Priority 1 sub-catchment 52 (Waitomo at Tumutumu Road) with Priority 2 sub-catchment 46 (Waitomo at SH31 Otorohanga) AND AMEND add to the list in Table 3.11-2 the combined area as: "Waitomo catchment, Priority 1".	Support in part Oppose in part	FFNZ agrees that sub-catchment plans ought to include the option for multiple sub-catchment plans. FFNZ is not sure of the impact of combing two sub-catchments and changing the priority and therefore cannot support it at this time.
Wairakei Pastoral Ltd	PC1-11396	Map 3.11-2: Map showing catchments	AMEND Map 3.11-2 to show the subdivision of sub-catchments 66 into sub-catchments 66A	Oppose in part	FFNZ is not sure of the impact of amending the sub-catchments and changing the priority as proposed and therefore cannot support it at this time.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74095			(Tahorakuri) and 66B (Ohakuri), as shown in Appendix D of the submission) and coloured appropriately to reflect their priority level.		
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2071	Map 3.11-2: Map showing catchments	AMEND Map 3.11-2 so that FMU's are based on sub-catchments that are grouped according to their physical attributes.	Support in part Oppose in part	As explained in FFNZ's submission on Variation 1, FFNZ is not sure that the FMUs are the appropriate spatial scale. However, it is concerned that a sub-catchment scale is too small. It would support reasonable amendments to the FMUs so that they are at an appropriate and reasonable spatial scale.
Hamilton, Malibu Submitter ID: 74083	PC1-10520	Conditions for permitted activity rule 5.1.4.11 and standards for controlled rule 5.1.4.11	AMEND PPC1 to include freshwater objectives, attributes, limits and targets in such a way as to: <ul style="list-style-type: none"> • Avoid, mitigate, or remedy actions during harvesting operations that accelerate erosion and minimise the discharge of sediment to water bodies • Limit riparian disturbance by felling away from the riparian zone except where unsafe or impractical to do so • Avoid more than minor adverse effects (e.g on aquatic habitat) • Ensure that mechanical land preparation is parallel to the contour where practical AND AMEND to ensure PPC1 has clear, enforceable permitted activity standards that will effectively control	Oppose	FFNZ does not support the 80 year numeric targets (see FFNZ's submission on Variation 1) and therefore opposes any proposal to make the targets more stringent or restrictive. FFNZ also considers that maintain ought to be maintain within a NOF band therefore does not support a requirement for numeric water quality states to be maintained. FFNZ does not support amendments to include additional freshwater states for reasons including that it is premature when the catchment is poorly understood and so many assumptions are lied upon, when better information and science is available they ought to be considered in the context of a NPS-FM community process and adopting such an approach now is likely to result in significant cost for no net benefit. FFNZ considers that a propionate and tailored approach ought to be adopted that targets critical source areas and assesses mitigations using MPA (see FFNZ's submission on Variation 1). FFNZ

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>potential environmental effects (including cumulative effects) AND AMEND to ensure that where sufficiently clear, enforceable permitted activity conditions cannot be devised, a consenting regime is adopted AND AMEND to ensure that where permitted activity standards are unlikely to be sufficient in over-allocated catchments, a consenting regime is required to ensure that the cumulative effects of forestry on water quality are managed to achieve targets within a defined timeframe AND AMEND to provide setbacks to harvesting, pruning-to-waste, all earthworks and any mechanical operations AND AMEND to apply setbacks to intermittent, as well as perennial streams AND AMEND to ensure that to protect the likely presence of threatened freshwater fish species and to provide appropriate protection to water quality, and riparian health, ensure a minimum setback of 10 metres on small streams; 20 metres on rivers between 3 and 20 metres; and rivers over 20 metres wide, and any protected by Water Conservation Orders should have a minimum setback of 30 metres</p>		<p>does not support a one size fits all or blanket approach, including approaches that impose stringent minimum standards or require activities or effects to be avoided. FFNZ considers a consistent approach ought to be adopted for all activities, including forestry.</p> <p>As set out in FFNZ's submission on Variation 1, FFNZ does not support an allocation approach or assessment of sub-catchments as over allocated (for reasons including that it does not support the 80 year numeric targets and insufficient information is currently available). FFNZ also considers that a reasonable policy and rule framework, including permitted activity standards, ought to be provided. FFNZ opposes amendments to make the standards more stringent for reasons including that this would not enable a tailored and proportionate approach or provide sufficient flexibility to recognise the nature of farming.</p> <p>FFNZ considers that stock exclusion and set backs ought to be addressed in Schedule C as minimum standards. FFNZ considers that the minimum standards ought to be reasonable, practical and affordable and on the basis set out in FFNZ's submission on Variation 1 e.g. 18 stock units as the threshold, accord water bodies and 1m cultivation setbacks. FFNZ considers that the need for stricter stock exclusion or setback requirements is something that ought to be considered as part of a FEP and tailored to the particular situation. FFNZ considers a consistent approach ought to be adopted for forestry.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to ensure no intrusion into setback areas from all forestry operations AND AMEND to ensure that the setback from wetlands is 30 metres AND AMEND to ensure that 30 metre setbacks for permitted earthworks within significant ecological areas or the appropriate setback should be determined having regard to the slope, drainage class and soil content.		FFNZ considers the proposed setbacks are likely to be unreasonable and will likely result in significant cost for no net benefit.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5808	Conditions for permitted activity rule 5.1.4.11 and standards for controlled rule 5.1.4.11	RETAIN Rule 5.1.5, 5.1.4.11.	Support in part	FFNZ supports retaining these rules provided that the outcome is a consistent approach between forest and other sectors.
New Zealand Farm Forestry Association - Waikato Branch Submitter ID: 73698	PC1-10132	Conditions for permitted activity rule 5.1.4.11 and standards for controlled rule 5.1.4.11	DELETE permitted activity condition 5.1.5(q) OR AMEND 515(q) to read: "In the Waikato and Waipā Catchment the Waikato Regional Council shall be notified in writing at least 20 working days prior to commencing harvest operations in a forest, <u>where that harvest operation exceeds 4 hectares in area, or where the harvest operation is within 50 metres of a stream, river or water body.</u> The written notice must include a harvest plan unless otherwise agreed with Waikato Regional Council. "	Support in part	FFNZ supports retaining these rules provided that the outcome is a consistent approach between forest and other sectors and that this does not result in unreasonable cost for no net benefit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
New Zealand Forest Owners Association Inc Submitter ID: 73524	PC1-9964	Conditions for permitted activity rule 5.1.4.11 and standards for controlled rule 5.1.4.11	RETAIN 5.1.5 (amendment to Rule 5.1.4.11) AND any consequential amendments.	Support in part	FFNZ supports retaining these rules provided that the outcome is a consistent approach between forest and other sectors.
NZ Forest Managers Ltd Submitter ID: 73443	PC1-6005	Conditions for permitted activity rule 5.1.4.11 and standards for controlled rule 5.1.4.11	AMEND Part B: 5.1.5 Conditions for Permitted Activity Rule 5.1.4.11 and Standards and Terms for Controlled Activity Rules to reduce the notification period from 'at least 20 working days' to 'at least 10 working days'. AND AMEND Part B: 5.1.5 Conditions for Permitted Activity Rule 5.1.4.11 and Standards and Terms for Controlled Activity Rules so that the harvest plan provision is removed from the notification requirement, or amended to be provided 'on request from Council'.	Support in part	FFNZ supports retaining these rules provided that the outcome is a consistent approach between forest and other sectors and that this does not result in unreasonable cost for no net benefit.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8950	Conditions for permitted activity rule 5.1.4.11 and standards for controlled rule 5.1.4.11	RETAIN 5.1.5 Conditions for Permitted Activity Rule without amendments.	Support in part	FFNZ supports retaining these rules provided that the outcome is a consistent approach between forest and other sectors and that this does not result in unreasonable cost for no net benefit.
Phillips, Neal Submitter ID: 71231	PC1-761	Conditions for permitted activity rule 5.1.4.11 and standards for controlled rule 5.1.4.11	AMEND 5.5.1 Permitted activity conditions so forestry logging is required to develop silt traps and keep silt traps clear.	Support in part	FFNZ supports amending the conditions to provide for silt traps and to keep them clear provided that the outcome is a consistent approach between forest and other sectors and that this does not result in unreasonable cost for no net benefit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Rayonier Matariki Forests Submitter ID: 73159	PC1-9591	Conditions for permitted activity rule 5.1.4.11 and standards for controlled rule 5.1.4.11	AMEND PPC1 to remove the requirement for block by block sediment and slash management details to be submitted to Council and replace with the following: " <u>A slash and sediment plan for a harvesting block that adheres to best management practices, shall be available on site for inspection on request at commencement of and during the harvest operation, with variations to the plan and reasons for the variations documented.</u> "	Oppose in part	FFNZ is concerned that this may lower the obligations on forestry and/or result in an approach that is not consistent with FEPs for farmers. Accordingly FFNZ opposes it if that is the effect.
Waikato Regional Council Submitter ID: 72890	PC1-3654	Conditions for permitted activity rule 5.1.4.11 and standards for controlled rule 5.1.4.11	RETAIN 5.1.5.	Support in part	FFNZ supports retaining these rules provided that the outcome is a consistent approach between forest and other sectors and that this does not result in unreasonable cost for no net benefit.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11397	Conditions for permitted activity rule 5.1.4.11 and standards for controlled rule 5.1.4.11	Permitted Activity Rule 5.1.4.11 in section 5.1.5 - RETAIN Consequential amendments to the Waikato Regional Plan as notified or amend by similar wording to like effect.	Support in part	FFNZ supports retaining these rules provided that the outcome is a consistent approach between forest and other sectors and that this does not result in unreasonable cost for no net benefit.
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2156	Conditions for permitted activity rule 5.1.4.11 and standards for controlled rule 5.1.4.11	RETAIN Rule 5.1.4.11.	Support in part	FFNZ supports retaining these rules provided that the outcome is a consistent approach between forest and other sectors and that this does not result in unreasonable cost for no net benefit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11016	5.1.5q)	AMEND 5.1.5 (q)(b) to include the following the provisions: <u>"v. Buffering measures undertaken;</u> <u>vi. Harvest and replanting regime."</u> Note also the submitter's Decisions Requested with respect to forest harvesting in General Submission point 11007.	Support in part	FFNZ would support the proposed changed provided that the outcome is a consistent approach between forest and other sectors and that this does not result in unreasonable cost for no net benefit.
Empson, Alan Jephson Howard Submitter ID: 74152	PC1-9094	5.1.5q)	AMEND Condition 5.1.5(q) to include a definition of the term forest.	Support in part	FFNZ agrees that a reasonable definition ought to be provided.
Mercury NZ Limited Submitter ID: 73182	PC1-9683	5.1.5q)	AMEND 5.1.5 q) to specify the limited circumstances (exceptions) when a harvest plan is not required. AND AMEND 5.1.5 q) Harvest Plan condition (a)(iv) to read: "iv. The location of any riparian vegetation including significant natural areas <u>identified in any relevant District Plan.</u> " AND AMEND 5.1.5 q) Harvest Plan, condition (b) (iv), to clarify the intent and meaning of riparian vegetation to be protected.	Support in part	FFNZ would support the proposed changed provided that the outcome is a consistent approach between forest and other sectors and that this does not result in unreasonable cost for no net benefit.
Port, Kelvin Robert Submitter ID: 73080	PC1-9643	5.1.5q)	AMEND 5.1.5(q) to ensure that farm forestry or woodlots less than 3 hectares are exempt.	Support in part	FFNZ would support the proposed changed provided that the outcome is a consistent approach between forest and other sectors and that this does not result in unreasonable cost for no net benefit. Alternatively, FFNZ considers that this is something that could be addressed as part of a FEP.
AFFCO New Zealand Limited Submitter ID: 74140	PC1-7620	Additions to glossary of terms	ADD a definition for regionally significant industry to read as follows: <u>"Regionally significant industry- means industry based on the use of</u>	Support in part	FFNZ agrees that reasonable definitions of "regionally significant industry" and BPO ought to be adopted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes:</u></p> <p><u>a) dairy manufacturing sites;</u> <u>b) meat processing plants and rendering plants;</u> <u>c) wood processing plants; and</u> <u>c) mineral extraction activities."</u></p> <p>AND ADD a definition of best practicable option, by adding a schedule to the Plan, which contains Waikato Regional Council's guidance material as representing the best practicable option in respect of diffuse source discharges. AND ADD the definition of best practicable option described in the Resource Management Act.</p>		FFNZ also consider that a consistent approach across all sectors in respect of BPO ought to be adopted and for farming activities it considers that ought to be on the basis of MPA (see FFNZ's submission on Variation 1).
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-11376	Additions to glossary of terms	AMEND PPC1 to define or explain what is meant by 'low level of contaminant discharge' and 'high levels of contaminant discharge'. AND AMEND PPC1 to provide a definition or explanation of 'low discharges'.	Support in part	In principle FFNZ sees merit in defining these terms but considers that it is important to adopt a narrative approach that provides for appropriate flexibility and to recognise that what is "low" or "high" in one context is not in another e.g. it could relate to soils or rainfall, or intensity of farming operation or farm system etc.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-13134	Additions to glossary of terms	RETAIN, DELETE, OR AMEND terms in Part C to ensure that they will, individually and collectively, give effect to substantive amendments sought and enable objectives, as retained or amended by the Fish and	Oppose	FFNZ opposes Fish & Game's submission and therefore opposes changes to Part C give effect to it.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Game submission, are to be achieved.		
BT Mining Ltd Submitter ID: 72453	PC1-9921	Additions to glossary of terms	ADD to the Glossary of terms a definition of Regionally Significant Infrastructure to read: " <u>Regionally significant industry: means an economic activity based on the use of natural or physical resources in the region which have benefits that are significant at a regional and/or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes:</u> <ul style="list-style-type: none"> • <u>Dairy manufacturing.</u> • <u>Meat processing.</u> • <u>Pulp and paper processing.</u> <u>Mineral extraction.</u> "	Support in part	FFNZ agrees that an appropriate definition of "regionally significant industry" ought to be adopted.
Chick, Adam Ross Submitter ID: 73985	PC1-9312	Additions to glossary of terms	AMEND the Glossary of terms definition of a waterway for stock exclusion to align with the definition in the NPS-FM.	Support in part Oppose in part	FFNZ considers that the stock exclusion requirements in Schedule C ought to apply to accord water bodies and considers they ought to be defined as set out in FFNZ's submission on Variation 1.
Dairy Goat Co-Operative (N.Z) Ltd Submitter ID: 74044	PC1-4140	Additions to glossary of terms	AMEND PPC1 so a common term (stock or livestock) is used and defined throughout the document, at least in relation to stock exclusion from water bodies. AND AMEND to ensure that the definition (stock or livestock) refers to cattle, horses, deer and pigs, as per Schedule C(1) only.	Support in part	FFNZ supports the use of a common sense and consistent term (stock or livestock) and definition. FFNZ agrees that the stock exclusion rules ought to apply to those referred to in Schedule C but considers that PC1 ought to apply to all farming activities.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Department of Conservation Submitter ID: 71759	PC1-10658	Additions to glossary of terms	ADD into the glossary a NEW definition for 'low discharging activities' AND ADD a NEW definition for 'regionally significant industry'.	Support in part Oppose in part	In principle FFNZ sees merit in defining “low discharge activities” but considers that it is important to adopt a narrative approach that provides for appropriate flexibility and to recognise that what is “low” or “high” in one context is not in another e.g. it could relate to soils or rainfall, or intensity of farming operation or farm system etc. FFNZ agrees that an appropriate definition of “regionally significant industry” ought to be adopted.
FarmRight Submitter ID: 73720	PC1-5415	Additions to glossary of terms	AMEND the definition of 'Freshwater Management Unit' to better represent the smaller catchment groups by identifying farms with similar features.	Oppose in part	FFNZ considers that the FMUs need amendment or further consideration and refers to its submission on Variation 1. However, it does not support identifying farms within FMUs or sub-catchments.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10616	Additions to glossary of terms	ADD to the Glossary of terms a definition of regionally significant infrastructure to read: " <u>Regionally Significant Infrastructure – means an economic activity based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes:</u> <u>a. Dairy manufacturing sites;</u> <u>b. Meat processing plants;</u> <u>c. Pulp and paper processing plants;</u> <u>and</u> <u>d. Mineral extraction activities.</u> " AND ADD a NEW definition of 'effective hectares' to read: " <u>Effective hectares: means the area of a property or enterprise as measured in hectares which is used</u>	Support in part Oppose in part	FFNZ agrees that an appropriate definition of “regionally significant industry” ought to be adopted. FFNZ supports a whole farm approach and not an effective area approach to calculating things like the NRP and therefore opposes the proposal to define effective area and protected wetland.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>for the regular grazing of animals or growing of crops or activities ancillary to those uses and which specifically excludes indigenous forest, plantation forest, closed canopy scrubland and protected wetlands."</p> <p>AND ADD a NEW definition of 'protected wetland' to read: <u>"Protected wetland: for the purpose of the definition of 'effective hectares' means a wetland that is fenced to exclude stock or which is legally protected by a rule in a district or regional plan, condition of resource consent or other legally binding instrument such that it cannot be lawfully grazed, drained, cleared or otherwise modified without the consent of a local authority or third party and for which no such consent has been issued. This definition excludes any wetland constructed for the purpose of mitigating the effects of agricultural discharges on water quality."</u></p>		
Fulton Hogan Limited Submitter ID: 74048	PC1-10819	Additions to glossary of terms	<p>ADD a NEW definition of Regionally Significant Industry as follows: <u>"Regionally significant industry - means an economic activity based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes:</u></p>	Support in part	FFNZ agrees that an appropriate definition of "regionally significant industry" ought to be adopted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>a) Dairy manufacturing sites;</u> <u>b) Meat processing plants;</u> <u>c) Pulp and paper processing plants;</u> <u>and</u> <u>d) Mineral extraction activities."</u>		
GBC Winstone Submitter ID: 73992	PC1-2968	Additions to glossary of terms	ADD to the Glossary of Terms a NEW definition to read: " <u>Regionally significant industry - means an economic activity based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes:</u> <u>a) Dairy manufacturing sites;</u> <u>b) Meat processing plants;</u> <u>c) Pulp and paper processing plants;</u> <u>and</u> <u>d) Mineral extraction activities."</u>	Support in part	FFNZ agrees that an appropriate definition of "regionally significant industry" ought to be adopted.
Hahn, Jacqueline Marie Submitter ID: 53103	PC1-11474	Additions to glossary of terms	AND ADD to the Glossary of terms, a definition of 'Wetlands' to read " <u>Wetland (functioning wetlands in past 5 years) and is 4% of wetlands catchment or portion there of when in intensive land use."</u>	Oppose in part	FFNZ considers that a definition of wetland would be helpful but considers that regard ought to be had to the regional plan and the RMA definition, as well as what is reasonable and practical and reasonably provides for farming. FFNZ does not consider that the proposed definition is appropriate.
Hamilton City Council Submitter ID: 74051	PC1-10208	Additions to glossary of terms	AMEND Additions to Glossary of Terms to include the definition of 'ecosystem services' that is contained in the Waikato regional Policy Statement (2016) definition. AND AMEND to include a definition for 'regionally significant infrastructure' in PPC1, similar to the	Oppose in part	FFNZ is not aware of the use of the term "ecosystem services" in PC1 so is not aware of the context for the definition. If the term is not used FFNZ considers that it should not be defined and FFNZ would not support amendments to PC1 to use the term. FFNZ agrees that an appropriate definition of "regionally significant industry" ought to be adopted.

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Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10227	Additions to glossary of terms	<p>definition in the Regional Policy Statement (2016).</p> <p>ADD a NEW definition for Catchment Collective to read: <u>"Definition - Catchment collective</u> <u>Catchment collective: means a group of enterprises or properties in multiple ownership, where the owners of those enterprises or properties undertake farming activities and operate as a collective for the purposes of contaminant management."</u> AND ADD a NEW definition for Certified Farm Environment Planner (Commercial Vegetable Production) to read: <u>"Certified Farm Environment Planner (Commercial Vegetable Production)</u> <u>Certified Farm Environment Planner (Commercial Vegetable Production):</u> <u>is a person or entity certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a Certified Farm Environment Planner (Commercial Vegetable Production) and has as a minimum the following qualifications and experience:</u> <u>a. Tertiary qualifications in agronomy or agricultural engineering</u> <u>b. More than 15 years' experience working with commercial vegetable cropping systems</u> <u>c. A certificate of competence</u></p>	Oppose in part	<p>FFNZ does not support this submitter's sub-catchment collective proposal and therefore does not support the proposed definition for catchment collective and sub-catchment scale management plan.</p> <p>FFNZ would support a reasonable definition of CFEP (commercial vegetable production) provided the outcome was consistent across all CFEPs and FEPs were robust.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>approved by the Waikato Regional Council relating to the relevant aspects of environmental farm plan assessment"</u> AND ADD new definition for Sub-catchment Scale Management Plans to read: <u>"Sub-catchment Scale Management Plan (SSMP)</u> <u>Sub-catchment Scale Management Plan (SSMP): means a sub-catchment scale plan for that sets out actions and responsibilities for a Catchment Collective (representing all or part of a sub-catchment) for the purposes of contaminant management that meets or exceeds the expected reduction in discharge to freshwater that would otherwise be achieved through a Farm Environment Plan."</u></p>		
J Swap Ltd Submitter ID: 71618	PC1-6436	Additions to glossary of terms	<p>ADD a NEW definition of 'regionally significant infrastructure' as follows - <u>"Regionally significant industry - means an economic activity based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes:</u> a) <u>Dairy manufacturing sites;</u> b) <u>Meat processing plants;</u> c) <u>Pulp and paper processing plants;</u></p>	Support in part	FFNZ agrees that an appropriate definition of "regionally significant industry" ought to be adopted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			and d) Mineral extraction activities."		
Lumbercorp NZ Ltd Submitter ID: 71753	PC1-9960	Additions to glossary of terms	AMEND PPC1 to include the following definition: "Regionally significant industry- means industry based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes: a) Dairy manufacturing sites; b) Meat processing plants; c) Pulp and paper processing plant and associated timber processing industries; and d) Mineral extraction activities."	Support in part	FFNZ agrees that an appropriate definition of "regionally significant industry" ought to be adopted.
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4474	Additions to glossary of terms	AMEND the Waikato Regional Policy Statement definition of wetland to: "Wetland included permanently or intermittently wet areas, shallow water, and land water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions and may include bogs, wet gully bottoms, swamps and seeps." AND AMEND the Edge of Field Mitigation/s definition AND/OR ADD a NEW term/definition that specifically relates to the function that these areas have in reducing contaminant losses to offsite surface waters (eg, 'Contaminant Mitigation Zone' -	Oppose	FFNZ considers the proposed amendment to wetland will unreasonably widen the definition of wetland, will be uncertain, will potentially catch most areas of pasture and will result in significant cost for no net environmental gain. In principle, FFNZ would support a reasonable definition of edge of field mitigation but does not support this submitter's proposal or the proposal to create buffers or contaminant mitigation zones for similar reasons as the reasons FFNZ opposes the changes to the definition of wetland.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			permanently or intermittently wet areas, shallow water, bogs, wet gully bottoms, swamps and seeps which have the potential to reduce losses of contaminants from farm land to surface water).		
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9369	Additions to glossary of terms	ADD a NEW definition to read: <u>"Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year."</u>	Support in part Oppose in part	In principle FFNZ would support a reasonable definition of intermittently flowing river if the intention was to clearly state that these are excluded from stock exclusion and other minimum standards. FFNZ would not support defining this term if the intention was to apply the minimum standards (and other standards) to it.
Mercury NZ Limited Submitter ID: 73182	PC1-9687	Additions to glossary of terms	ADD a NEW definition of regionally significant industry to the Glossary of Terms to read: <u>"Regionally significant industry - For the purpose of Chapter 3.11, means an economic activity based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale, including their associated point source discharges. These may include social, economic or cultural benefits. Regionally significant industry includes the following activities, but does not include primary production activities or Certified Sector Schemes:</u> <u>a. Dairy manufacturing sites</u> <u>b. Meat processing and rendering Plants</u> <u>c. Pulp and paper processing plants:</u> <u>and</u> <u>d. mineral extraction activities."</u>	Support in part	FFNZ agrees that an appropriate definition of "regionally significant industry" ought to be adopted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Miraka Limited Submitter ID: 73492	PC1-8901	Additions to glossary of terms	AMEND the Glossary of Terms to include the definition of 'property'.	Support in part	In principle, FFNZ sees merit in a reasonable definition of property to provide certainty and clarity.
New Zealand Grain and Seed Trade Association Submitter ID: 71229	PC1-1688	Additions to glossary of terms	ADD a NEW definition of winter, and clarify who determines this period how it applies to winter forage crops. AND AMEND to further clarify AND OR define how the 15 degree slope restriction will be interpreted (i.e. part of the paddock and apply to all the paddock, the paddock average, how and who calculated) and what are accepted mitigations above 12 degrees slope.	Support in part	In principle, FFNZ considers defining “winter” would help to provide clarity. FFNZ considers that the references to slope ought to be deleted but if they are not then it agrees that a reasonable definition ought to be adopted e.g. 80% of a paddock is about a certain slope.
New Zealand Steel Ltd Submitter ID: 73790	PC1-3711	Additions to glossary of terms	AMEND the Glossary of Terms in PPC1 to include the following definition: " <u>Regionally significant industry - means industry based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes: a) dairy manufacturing sites; b) Meat processing plants; c) Pulp and paper processing plants; d) Mineral extraction activities; and e) Product manufacturing.</u> "	Support in part	FFNZ agrees that an appropriate definition of “regionally significant industry” ought to be adopted.
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11870	Additions to glossary of terms	ADD a NEW definition to read: " <u>Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops</u>	Support in part Oppose in part	In principle FFNZ would support a reasonable definition of intermittently flowing river if the intention was to clearly state that these are excluded from stock exclusion and other minimum standards. FFNZ would not support defining this

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>flowing on at least one occasion during the year."</u>		term if the intention was to apply the minimum standards (and other standards) to it.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-12311	Additions to glossary of terms	AMEND PPC1 by providing a definition of regionally significant industry that includes that Kinleith Industrial Park, for example, as follows: <u>"Regionally significant industry- means industry based on the region's use of natural and physical resources which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes:</u> a) <u>Wood processing plants;</u> b) <u>Dairy manufacturing sites;</u> c) <u>Meat processing plants;</u> d) <u>Mineral extraction activities; and</u> e) <u>Renewable energy generation."</u>	Support in part	FFNZ agrees that an appropriate definition of "regionally significant industry" ought to be adopted.
Pouakani Trust Submitter ID: 73785	PC1-6331	Additions to glossary of terms	ADD to the Glossary of terms a definition of property. AND AMEND to provide for a requirement for sediment management qualifications (such as New Zealand Association of Resource Managers Professional Certification) in the definition of Certified Farm Environment Planner, AND AMEND to clarify the definition of Edge of field mitigation/s, AND RETAIN the definition of Enterprise, AND AMEND to clarify which specific version of the OVERSEER Model is	Support in part Oppose in part	FFNZ considers that CFEPs ought to be appropriately qualified but is concerned that the proposal may be too stringent and unreasonably reduce the pool of CFEPs FFNZ would support a reasonable and appropriate definition of edge of field mitigations. FFNZ considers the definition of enterprise needs to be amended as proposed in its submission on Variation 1. FFNZ considers that flexibility ought to be adopted with the version of Overseer. In principle, FFNZ supports the use of the most recent version of

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			to be used in the definition of Nitrogen Reference Point.		Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.
Raukawa Charitable Trust Submitter ID: 74073	PC1-10577	Additions to glossary of terms	ADD a NEW definition to read: <u>"Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year."</u>	Support in part Oppose in part	In principle FFNZ would support a reasonable definition of intermittently flowing river if the intention was to clearly state that these are excluded from stock exclusion and other minimum standards. FFNZ would not support defining this term if the intention was to apply the minimum standards (and other standards) to it.
Sellars, Michael David and Alison Jean Submitter ID: 72401	PC1-9170	Additions to glossary of terms	ADD a definition for 'grazed land': " <u>A property on which grazing takes place not limited to the area of the property which is actually grazed.</u> " AND AMEND to provide clear definition of stocking rate.	Support in part	FFNZ considers that it would be helpful to adopt reasonable definitions of grazing and stock units (it considers stocking rate is not relevant within the context of PC1).
South Waikato District Council Submitter ID: 72892	PC1-9724	Additions to glossary of terms	ADD a definition for regionally significant infrastructure: " <u>Regionally significant infrastructure means 'municipal wastewater treatment plants, water supply treatment plants and bulk water supply, wastewater conveyance and storage systems, municipal supply dams and ancillary infrastructure.'</u> " AND ADD a definition of regionally significant industry: " <u>Regionally significant industry means 'an economic activity based on use of</u>	Support in part	FFNZ agrees that an appropriate definition of "regionally significant industry" ought to be adopted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits or a combination thereof Regional significant industry includes:</u> a) Dairy manufacturing sites; b) Meat processing plants; and c) Pulp and paper processing plants."		
Taupo District Council Submitter ID: 74207	PC1-8172	Additions to glossary of terms	AMEND the additions to the Glossary of Terms to include a definition for regionally significant infrastructure, which includes storm water infrastructure AND AMEND to include a definition for the term 'urban' to assist with implementing Schedule A.	Support in part	FFNZ agrees that an appropriate definition of "regionally significant industry" ought to be adopted. However, it does not include that stormwater infrastructure should necessarily be included. FFNZ considers that "urban properties" ought to be defined as proposed in its submission on Variation1.
Te Arawa River Iwi Trust Submitter ID: 73697	PC1-11820	Additions to glossary of terms	ADD a NEW definition to read: "Intermittently flowing river: <u>Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u> "	Support in part Oppose in part	In principle FFNZ would support a reasonable definition of intermittently flowing river if the intention was to clearly state that these are excluded from stock exclusion and other minimum standards. FFNZ would not support defining this term if the intention was to apply the minimum standards (and other standards) to it.
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10630	Additions to glossary of terms	ADD a NEW definition to read: "Intermittently flowing river: <u>Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u> "	Support in part Oppose in part	In principle FFNZ would support a reasonable definition of intermittently flowing river if the intention was to clearly state that these are excluded from stock exclusion and other minimum standards. FFNZ would not support defining this term if the intention was to apply the minimum standards (and other standards) to it.
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3675	Additions to glossary of terms	ADD a NEW definition to read: "Intermittently flowing river: <u>Intermittently flowing river means a river or stream that, in its natural</u>	Support in part	In principle FFNZ would support a reasonable definition of intermittently flowing river if the intention was to clearly state that these are excluded from stock exclusion and other minimum

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			<u>state during an average year, stops flowing on at least one occasion during the year."</u>	Oppose in part	standards. FFNZ would not support defining this term if the intention was to apply the minimum standards (and other standards) to it.
Waikato Regional Council Submitter ID: 72890	PC1-3666	Additions to glossary of terms	<p>ADD a NEW definition to the Glossary of Terms to read "<u>Current version of OVERSEER® is the version of the Overseer® Model with the most recent release date.</u>"</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Period to read: "<u>...is a property's or enterprise's 2014/15 and 2015/16 financial years, except for properties or enterprises where the principle land use is commercial vegetable production, in which case the nitrogen reference period is the period commencing with the property's or enterprise's 2006/7 financial year and ending with its 2015/16 financial year.</u>"</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Period Data to read: "<u>is the set of verified OVERSEER input parameters for each of the financial years of the nitrogen reference period.</u>"</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Point Data to read: "<u>is the verified Overseer input parameters for the single financial year of the nitrogen reference period that when modelled in the version of Overseer current at</u></p>	<p>Support in part</p> <p>Oppose in part</p>	<p>FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.</p> <p>FFNZ considers that that reference period ought to be changed as proposed in its submission on Variation 1 (i.e. a 10 year period) and therefore the definition of NRP ought to reflect this.</p> <p>FFNZ would support a reasonable definition of nitrogen reference period data provided that clarification was provided on "verified" and who would need to do that and provided this is reasonable and does not impose unnecessary cost.</p> <p>FFNZ considers that urban properties sought to be defined as proposed in its submission on Variation 1.</p> <p>FFNZ opposes the proposal to include intermittent wet areas in the definition of wetland and considers that this is likely to cause uncertainty, impose significant cost, be impractical and inflexible and have other adverse consequences in the context of minimum and other standards applying to wetlands.</p>

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			<p><u>1 April 2019 results in the highest nitrogen leaching rate.</u></p> <p>AND ADD to the Glossary of Terms in Chapter 3.11 a specific definition for urban properties.</p> <p>AND ADD a NEW definition to the Glossary of Terms for Wetland to read: "For the purposes of Chapter 3.11 includes permanently or intermittently wet areas, shallow water, and land water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions."</p>		
Waikato River Authority Submitter ID: 74033	PC1-11565	Additions to glossary of terms	ADD a definition of wetland to the additions to the glossary to read "permanently or intermittently wet areas, shallow water, and land water margins that support plants that are adapted to wet conditions" and apply this definition to rules relating to the drainage of wetlands, as contained within the operative Regional Plan.	Oppose in part	In principle FFNZ would support reasonable definitions of permanently and intermittently flowing water bodies if the intention was to clearly state that intermittent ones are excluded from stock exclusion and other minimum standards. FFNZ would not support defining these terms if the intention was to apply the minimum standards (and other standards) to intermittent water bodies. This appears to be the intention and the intention appears to retrospectively apply this to the rest of the regional plan. Therefore FFNZ opposes the proposal.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11400	Additions to glossary of terms	ADD a NEW definition for 'adaptive management' to read: " <u>Adaptive management means the approach to avoiding, remedying or mitigating any actual or potential adverse effects on the environment that addresses risk or uncertainty arising from consented sub-catchment-wide land use change and farming activities and associated contaminant discharges carried out</u>	Oppose in part	In principle, FFNZ supports an adaptive management approach provided that this is not based on a precautionary approach and instead adopts more specific or stringent requirements as more information and robust science is available. FFNZ would support a definition that is consistent with this view. However, FFNZ is concerned that the proposed definition is inconsistent with this view and therefore opposes it.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>by an enterprise as detailed in Schedule 3, namely:</u> <u>a) The need for good baseline information about the receiving environment;</u> <u>b) Whether consent conditions provide for effective monitoring of adverse effects using appropriate indicators;</u> <u>c) That thresholds are set to trigger remedial action before the effects become overly damaging; and</u> <u>d) That any effects that might arise can be remedied before they become irreversible."</u> AND ADD a NEW definition for 'Decision Support Tool' to read: <u>"Decision Support Tool means an information and accounting framework that can be used to assist with analysis and decision making processes within an enterprise (or property) that supports the management of diffuse discharges from properties of nitrogen, phosphorus, sediment and microbial pathogens at a sub-catchment scale."</u> AND ADD a NEW definition for 'mitigation measures' to read: <u>"Mitigation measures means the measures (as detailed in Schedule 4) to be undertaken by an enterprise to ensure that the actual effects of carrying out sub-catchment-wide land use change and farming activities and associated contaminant</u></p>		<p>FFNZ opposes the proposal to define "decision support tool" for reasons including that this appears to be to support allocation or the submitter's sub-catchment collective proposal and FFNZ opposes this.</p> <p>FFNZ opposes the proposal to define discharges from farming land use as point source discharges.</p> <p>FFNZ opposes this submitter's sub-catchment collective proposal and therefore opposes the proposal to add three new schedules.</p>

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			<p><u>discharges are within the scope of the AEE that accompanied the original resource consent application.</u></p> <p>AND ADD a NEW definition for 'sub-catchment management plan' to read: <u>"Sub-catchment management plan means a plan for the relevant part of a PPC1 sub-catchment (Map 3.11-2) prepared following a collaborative process involving iwi and other stakeholders, that identifies water quality issues and principles and management actions (including Decision Support Tools) required to manage these issues."</u></p> <p>AND AMEND the definition for 'point source discharges' to read: "Point-source discharge: For the purposes of Chapters 3.5 and 3.11, means <u>discharges associated with farming land use, and discharges from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems."</u></p> <p>AND ADD 3 NEW schedules (as set out in Appendix B of the submission) to give effect to the above definitions.</p>		
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2159	Additions to glossary of terms	<p>ADD a definition of 'property' to read as follows: <u>"One contiguous block of land owned by one common owner."</u></p> <p>AND ADD a definition of 'common owner' to read as follows: <u>"100% ownership."</u></p>	Support in part Oppose in part	In principle, FFNZ supports a reasonable definition of "property" but considers it should not be limited to common owner and should not be required to be contiguous unless PC1 is amended to provide for FEPs (and other requirements) to be on either a property or an enterprise basis.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND ADD a definition for the version of the OVERSEER Model that will be used to calculate the Nitrogen Reference Point and future versions. Define past, current and future.		FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise. Accordingly, FFNZ considers that any definition ought to reflect this.
Wallace, Martin Lindsay Submitter ID: 72975	PC1-8403	Additions to glossary of terms	ADD a NEW definition that reads: <u>"Nitrogen Discharge Limit shall be determined for each property within a sub-catchment such that the nitrogen discharge targets of Objective 3 for the sub-catchment are met, with the highest discharges required to be reduced first."</u>	Oppose	FFNZ does not support any form of allocation and therefore opposes this definition.
Watercare Services Ltd Submitter ID: 74077	PC1-8340	Additions to glossary of terms	ADD to the Glossary of terms the definition of regionally significant infrastructure as defined in the Waikato Regional Policy Statement.	Support in part	FFNZ agrees that an appropriate definition of "regionally significant industry" ought to be adopted.
DairyNZ Submitter ID: 74050	PC1-10253	75 th percentile nitrogen leaching value	AMEND the definition of the 75th percentile nitrogen leaching value to read: "The 75th percentile value... by march 2019, <u>as determined by the Chief Executive of the Waikato Regional Council and published on the Waikato Regional Council website on or before 30 June 2019.</u> "	Support in part	FFNZ would support a reasonable definition of the 75 th percentile and the proposal to provide clarity about when it will be available but considers that it needs to be on the basis of the river FMUs or some other reasonably appropriate spatial scale.
FarmRight Submitter ID: 73720	PC1-9634	75 th percentile nitrogen leaching value	AMEND the definition of '75th percentile nitrogen leaching value' to read: "The 75th percentile value..."	Support in part	FFNZ would support a reasonable definition of the 75 th percentile and the proposal to provide clarity about when it will be available but considers that it

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			received by the Waikato Regional Council <u>12 calendar months following the provisions of PPC1 becoming operative by 31 March 2019.</u> For the avoidance of doubt, the 75th percentile value is to be determined on farming enterprise basis. That is, that the highest 25th percentile of each industry (dairy farming, drystock and commercial vegetable production) will be required to reduce."	Oppose in part	needs to be on the basis of the river FMUs or some other reasonably appropriate spatial scale. FFNZ also considers that a reasonable consenting pathway needs to be provided for those who cannot reduce to the 75 th percentile and therefore does not agree with the proposed last sentence.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10573	75 th percentile nitrogen leaching value	AMEND Glossary of terms definition of the 75th percentile nitrogen leaching value to read: "...are received by the Waikato Regional Council by 31 March 2019, as determined by the Chief Executive of the Waikato Regional Council and published on the Waikato Regional Council website on or before 20 June 2019."	Support in part	FFNZ would support a reasonable definition of the 75 th percentile and the proposal to provide clarity about when it will be available but considers that it needs to be on the basis of the river FMUs or some other reasonably appropriate spatial scale.
Kidd, Peter Arthur and Marilyn May Submitter ID: 72710	PC1-5720	75 th percentile nitrogen leaching value	AMEND the definition of 75th percentile nitrogen leaching value so that it has a more relevant basis, such as a sub-catchment basis OR AMEND so that a body with discretionary powers should advise on this matter.	Support in part Oppose in part	FFNZ would support a reasonable definition of the 75 th percentile and considers that it needs to be on the basis of the river FMUs or some other reasonably appropriate spatial scale. FFNZ is not sure what is meant about the body with discretionary powers or what those powers would be so it therefore opposes that part of the submission point.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-12312	75 th percentile nitrogen leaching value	REMOVE from the PPC1/ Glossary of terms - reference to the 75th percentile nitrogen leaching value.	Oppose in part	In principle, FFNZ supports the 75 th percentile and reducing to it provided that a reasonable consenting pathway is provided for those who cannot reduce or provides time for the reductions and reasonable spatial scale for calculating the 75 th percentile (see FFNZ's submission on Variation 1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Waikato Regional Council Submitter ID: 72890	PC1-3664	75 th percentile nitrogen leaching value	AMEND the Glossary definition of 75 th percentile nitrogen leaching value to clarify the method for calculating the 75 th percentile. AND AMEND to include in the definition that this calculation will be undertaken once at a single point in time. AND AMEND the Glossary definition of 75 th percentile nitrogen leaching value to clarify that a 75 th percentile nitrogen leaching value will only be established for each of the four riverine Freshwater Management Units, and will apply to any lake catchments within each riverine Freshwater Management Unit.	Support in part	FFNZ agrees that clarity around how the 75 th percentile is calculated ought to be provided and refers to its submission on Variation 1 (in particular its proposal to provide clarity on this in the methods). FFNZ agrees that the 75 th percentile ought to be calculated on the basis of the river FMUs or some other appropriate management scale (see FFNZ's submission on Variation 1).
Wairarapa Moana Incorporation Submitter ID: 72480	PC1-2158	75 th percentile nitrogen leaching value	DELETE Definition - 75 th Percentile Nitrogen leaching value.	Oppose in part	In principle, FFNZ supports the 75 th percentile and reducing to it provided that a reasonable consenting pathway is provided for those who cannot reduce or provides time for the reductions and reasonable spatial scale for calculating the 75 th percentile (see FFNZ's submission on Variation 1).
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6253	Definition – arable cropping	AMEND the definition of arable cropping to clarify that Rule 3.11.5.7 does not include the rotation of crops and stock grazing on a seasonal basis, which forms part of day to day farming activities.	Support	FFNZ agrees that this ought to be clarified as the submitter proposes.
Pukerimu Farms Limited Submitter ID: 73073	PC1-4813	Definition – arable cropping	REMOVE the arbitrary delineation between different forms of cropping that in reality have very similar effect. The definitions would become unnecessary if the land use change rule is deleted and replaced with	Support in part	FFNZ would support a more appropriate basis of defining or managing arable cropping. However it considers that BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			region wide Best Management practice based rules as proposed.		part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11199	Definition – arable cropping	AMEND the definition of arable cropping to clarify that Rule 3.11.5.7 does not include the rotation of crops and stock grazing on a seasonal basis, which forms part of day to day farming activities.	Support	FFNZ agrees that this ought to be clarified as the submitter proposes.
Strang and Strang Limited Submitter ID: 73851	PC1-5579	Definition – arable cropping	REMOVE from the definition of arable cropping the arbitrary delineation between different forms of cropping that in reality have very similar effects.	Support in part	FFNZ would support a more appropriate basis of defining or managing arable cropping.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8452	Definition – arable cropping	RETAIN the definition for Arable Cropping.	Support in part	In principle, FFNZ agrees that arable cropping ought to be defined.
Waiawa Farms Submitter ID: 71346	PC1-5852	Definition – arable cropping	REMOVE the arbitrary delineation between different forms of cropping that have very similar effects. (Definition - Arable Cropping)	Support in part	FFNZ would support a more appropriate basis of defining or managing arable cropping.
AFFCO New Zealand Limited Submitter ID: 74140	PC1-7675	Definition – best management practices	DELETE the definition for best management practice and REPLACE with the definition of Best Practicable Option from the Resource Management Act 1991.	Support	FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as some submitters have proposed.
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6255	Definition – best management practices	AMEND definition to read as follows (or similar wording to address reason for submission): "Best management practice/s: For the purposes of Chapter 3.11, means maximum feasible mitigation to reduce the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens from land use activities given current technology. <u>This includes off-set mitigation techniques implemented across an enterprise.</u> "	Oppose in part	FFNZ considers that the definition of BMP ought to be deleted but in the event it is not it considers that offsets need to be provided for.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10659	Definition – best management practices	DELETE the definition of Best Management Practice/s OR ADOPT one definition of Good Management Practice in preference to a specific interpretation for Chapter 3.11 alone.	Support	FFNZ agrees that the definition of BMP ought to be deleted. FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10225	Definition – best management practices	RETAIN the definition of Best Management Practice/s.	Oppose	FFNZ considers that the definition of BMP ought to be deleted. FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).
Kilgour, Gareth Submitter ID: 72950	PC1-1946	Definition – best management practices	AMEND the definition - Best management Practice/s to increase clarity. AND DELETE the word 'maximum'.	Oppose	FFNZ considers that the definition of BMP ought to be deleted. FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8847	Definition – best management practices	AMEND to Glossary of terms to replace the term Good Management Practices and Best Management Practices with Best Practicable Option as defined by the Resource Management Act. AND AMEND by making commensurate changes to PPC1 as required.	Support	FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1). In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as this submitter proposes.
Pinnell, Graham Submitter ID: 74007	PC1-4455	Definition – best management practices	ADD to the Definition of Best Management Practice the words: " <u>and taking account of cost effectiveness.</u> "	Oppose	FFNZ considers that the definition of BMP ought to be deleted. FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Ravensdown Limited Submitter ID: 74058	PC1-10186	Definition – best management practices	DELETE the definition for Best Management Practice. OR ADOPT a generic definition for Good Management Practice in preference to a specific interpretation for Chapter 3.11 alone. A suggested definition is: <u>"means the practices described in the document entitled Industry-agreed Good Management Practices relating to water quality dated 18 September 2015."</u>	Support in part	FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1). In principle, FFNZ supports an approach to diffuse discharges based on BPO and as defined by the MPA framework FFNZ proposed for FEPs and as set out in its submission on Variation 1. However, FFNZ does not support BPO if it is based on input controls, as this submitter proposes.
Reeve, Jocelyn Margaret Submitter ID: 73109	PC1-10046	Definition – best management practices	AMEND the definitions of Best Management Practice and Good Management Practice to combine them into one.	Oppose in part	FFNZ considers that the definition of BMP ought to be deleted. FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11200	Definition – best management practices	AMEND definition to read as follows (or similar wording to address reason for submission): "Best management practice/s: For the purposes of Chapter 3.11, means maximum feasible mitigation to reduce the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens from land use activities given current technology. <u>This includes off-set mitigation</u>	Oppose in part	FFNZ considers that the definition of BMP ought to be deleted but in the event it is not it considers that offsets need to be provided for.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>techniques implemented across an enterprise."</u>		
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8192	Definition – best management practices	ADD a NEW Schedule XX that sets out the expectations for best management practice, including standards and measures that Council can enforce AND AMEND the definition for best management practice/s to read: "For the purposes of Chapter 3.11, means maximum feasible mitigation to reduce the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens from land use activities given current technology" <u>Best management practice/s means the practices set out in Schedule XX"</u> AND AMEND objectives and policies to ensure that all landowners have to achieve good management practices by 2019 AND AMEND to require the adoption of good management practice by all landowners and, if necessary work towards best management practice.	Oppose	FFNZ considers that the definition of BMP ought to be deleted. FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1). FFNZ opposes amendments to rule to require landowners to achieve GMP or adopt GMP or to link this to a date for reasons including it does not provide sufficient flexibility or tailoring and will likely impose significant cost for no net gain.
Waikato Regional Council Submitter ID: 72890	PC1-3665	Definition – best management practices	AMEND the Glossary definition of best management practice to make it clear that the term includes mitigation that can also be achieved through changes to management practices.	Oppose in part	FFNZ considers that the definition of BMP ought to be deleted. FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6261	Definition – certified farm environment planner	AMEND PPC1 to include better and further particulars regarding the certification of Certified Farm Environment Planners and expected timing for certification/listing on the Waikato Regional Council website.	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-7113	Definition – certified farm environment planner	AMEND the Definition of Certified Farm Environmental Planner (b) to read: "completed advanced training or a tertiary qualification in sustainable nutrient management (nitrogen and phosphorus), <u>and shall include a Certificate of Completion in Advanced Sustainable Nutrient Management in New Zealand from Massey University;</u> and" AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs.
DairyNZ Submitter ID: 74050	PC1-10250	Definition – certified farm environment planner	AMEND the Definition of Certified Farm Environment Planner to read: "Certified Farm Environment Planner: is a person or entity certified... c. <u>Has either completed training that demonstrates that they are competent to complete the sediment and microbial risk assessments and mitigation identification in Farm Environment Plans, or has</u> experience in soil conservation and sediment management and, d. <u>The Chief Executive Officer may limit the Certified Farm Environment Planner to particular farming systems where they have the</u>	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>necessary skills and training to complete Farm Environment Plans."</u>		
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10662	Definition – certified farm environment planner	AMEND the definition to read: "Certified Farm Environment Planner: is a person or entity certified by the Chief Executive Officer of Waikato Regional Council... ... b. <u>holds a certificate in the Advanced Sustainable Nutrient Management in New Zealand Agriculture Course, or completed equivalent advanced training or a tertiary qualification in sustainable nutrient management (nitrogen and phosphorous); and...</u> "	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs.
Fogarty, David Submitter ID: 73966	PC1-8420	Definition – certified farm environment planner	AMEND Definition - Certified Farm Environment Planner to ensure the positions are outside Council.	Support in part	FFNZ agrees that the CFEP ought to be independent from Council.
Hill Country Farmers Group Submitter ID: 73321	PC1-8072	Definition – certified farm environment planner	AMEND the definition of a Certified Farm Environment Planner to encompass experience as a qualification and to ensure that enough planners are available to meet demand.	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs.
Lichtwark, Quintin Owen Submitter ID: 72535	PC1-1866	Definition – certified farm environment planner	AMEND the definition of Certified Farm Environment Planners to ensure that they have an appropriate level of experience (e.g. 5 years). AND AMEND the definition of Certified Farm Nutrient Advisor to ensure that they have an appropriate level of experience (e.g. 5 years).	Support in part Oppose in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs. It is concerned that a requirement for five years experience is too stringent.
McGovern, Annette Submitter ID: 72969	PC1-8288	Definition – certified farm	AMEND Definition - Certified Farm Environment Planner to provide utmost clarity and allow for a	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
		environment planner	sufficient pool of certified persons to be available to the market AND AMEND to reflect that certified persons will be added to the Council website once PPC1 is operative.		be so stringent as to unreasonably limit the pool of available people to be CFEPs.
Miraka Limited Submitter ID: 73492	PC1-8902	Definition – certified farm environment planner	AMEND the definition for Certified Farm Environment Planner to include a requirement for sediment management qualifications, such as the New Zealand Association of Resource Managers Professional Certification.	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs.
New Zealand Association of Resource Management Submitter ID: 71702	PC1-7993	Definition – certified farm environment planner	AMEND the definition for Certified Farm Environment Planner to ensure that Certified Farm Environment Planners provide certified evidence of having undertaken and completed specialist training in land use capability mapping, and also submit at least two land use capability farm maps they have prepared, for peer review by expert Catchment Management staff of Waikato Regional Council. AND AMEND to ensure that suitable training courses are offered to staff and consultants for upskilling on land use capability mapping at farm scale level.	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs. FFNZ supports moves to ensure training and upskills is reasonably available and cost effective.
New Zealand Institute of Primary Industry Management - Waikato Branch Submitter ID: 73558	PC1-8445	Definition – certified farm environment planner	AMEND Definition – Certified Farm Environment Planner to read: Certified Farm Environment Planner: is a person or entity certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council	Support in part Oppose in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>website as a Certified Farm Environment Planner and has as a minimum the following qualifications and experience:</p> <p>a. five years <u>relevant</u> experience in <u>agricultural and horticultural the management of pastoral, horticulture or arable</u> farm systems; and</p> <p>b. completed advanced training or a tertiary qualification in sustainable nutrient management (nitrogen and phosphorus); and</p> <p>c. <u>has either completed training that demonstrates that they are competent to complete the sediment and microbial risk assessments and mitigation identification in Farm Environment Plans, or has</u> experience in soil conservation and sediment management.</p>		
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4672	Definition – certified farm environment planner	<p>AMEND the Definition Certified Farm Environment Planner to read: "...(a) five years' experience in the management of pastoral, <u>outdoor pig farming</u>, horticulture or arable farm systems</p> <p>(b) completed advanced training in agriculture... sustainable nutrient management (nitrogen and phosphorus); <u>or holds any other qualification, that has been approved by the Chief Executive of Waikato Regional Council, as being an equivalent standard with respect to the knowledge and competencies required.</u>"</p>	Support in part	<p>In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs. FFNZ agrees that the skills and qualifications ought to be relevant to the specific industry e.g. outdoor pig farming.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8854	Definition – certified farm environment planner	DELETE from the Glossary of terms - Definition - Certified Farm Environment Planner if the alternative approach proposed in the submission is adopted IF not deleted AMEND in the definition the term 'advanced training' so that it is a person who holds " <u>a Certification of Completion in Sustainable Nutrient Management in New Zealand Agriculture and a Certificate of Completion in Advanced Sustainable Nutrient Management from Massey University.</u> "	Oppose	FFNZ considers the CFEP approach ought to be retained. FFNZ supports FEPs prepared by certified farm environment planners on the basis that Council has control over the CFEP and not the content of the FEP. FFNZ is concerned that if the landowner prepared the FEP then Council would likely need to have control over the FEP and that is not an appropriate outcome for reasons including that Council is not in the business of farming or does not have an understanding of the particular property.
Pouakani Trust Submitter ID: 73785	PC1-13136	Definition – certified farm environment planner	AMEND to provide for a requirement for sediment management qualifications (such as New Zealand Association of Resource Managers Professional Certification) in the definition of Certified Farm Environment Planner.	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs.
Pouakani Trust Submitter ID: 73785	PC1-6487	Definition – certified farm environment planner	AMEND the Glossary of terms definition of Certified Farm Environment Planners to provide for a requirement for sediment management qualifications (such as New Zealand Association of Resource Managers Professional Certification) in the definition of Certified Farm Environment Planner.	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs.
Ravensdown Limited Submitter ID: 74058	PC1-10187	Definition – certified farm environment planner	AMEND the definition for Certified Farm Environment Planner as follows: "Certified Farm Environment Planner: is a person or entity certified by the Chief Executive Officer of Waikato	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Regional Council and listed on the Waikato Regional Council website as a Certified Farm Environment Planner and has as a minimum the following qualifications and experience:</p> <p>a. Five years' experience in the management of pastoral, horticulture or arable farm systems; and Implements OVERSEER input best practice and uses standard protocols recognised and approved by the Waikato Regional Council; and</p> <p>b. Holds a certificate in the Advanced Sustainable Nutrient Management in New Zealand Agriculture Course or completed equivalent advanced training or a tertiary qualification in sustainable nutrient management (nitrogen and phosphorus); and</p> <p>c. Has at least 5 years' work experience in soil conservation and sediment management a land use/farm advisory role; or</p> <p>d. Is approved in writing by the Chief Executive (or delegate thereof) of the Waikato Regional Council."</p>		
Reeve, Jocelyn Margaret Submitter ID: 73109	PC1-10048	Definition – certified farm environment planner	AMEND the definition of Certified Farm Environment Planner by using an agreed term for Certified Farm Environment Planner and Certified Farm Nutrient Advisor after consultation with existing industry certification schemes.	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to ensure existing professional organisation certification lists are used.		
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11201	Definition – certified farm environment planner	AMEND PPC1 to include better and further particulars regarding the certification of Certified Farm Environment Planners and expected timing for certification/listing on the Waikato Regional Council website.	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8478	Definition – certified farm environment planner	REMOVE the term 'entity' from the definition of Certified Farm Environment Planner AND ADD the following requirements: "a. five years' experience in the management of pastoral, horticultural or arable farm systems; and, <u>is a current member of a professional institute that requires members to subscribe to a Code of Ethics, and has a procedure in place for dealing with complaints made against members; and</u> b. completed advanced training or a tertiary qualification in sustainable nutrient management (nitrogen and phosphorus) demonstrates to <u>Waikato Regional Council proficiency in the auditing of Farm Environment Plans against the matters set out in Part X[c] of Schedule Y[7]."</u>	Oppose	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFEPs. FFNZ is concerned that this definition is too stringent for no net benefit. FFNZ opposes the schedules proposed by this submitter and opposes the preparation of FEPs on this basis.
Waipapa Farms Ltd and Carlyle Holdings Ltd	PC1-4625	Definition – certified farm environment planner	AMEND Definition- Certified Farm Environment Planner by providing clarity and allows for a sufficient pool	Support in part	In principle, FFNZ supports clarity around CFEPs and qualifications to ensure fair, robust and cost effective FEP regime but considers they should not

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73863			of certified persons to be available to the market.		be so stringent as to unreasonably limit the pool of available people to be CFEPs.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-7090	Definition – certified farm nutrient advisor	DELETE the Definition Certified Farm Nutrient Advisor and REPLACE with the words: " <u>Certified Nutrient Management Advisor means a Nutrient Management Advisor certified under the Nutrient Manager Advisor Certification Programme Ltd</u> ". AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	Support in part Oppose in part	FFNZ would support the change in terminology to Certified Nutrient Management Advisor provided that this does not unreasonably reduce the pool of people available to prepare NRPs or increase the cost to farmers or make compliance more stringent.
Carter, Shaun Colin Thomas Submitter ID: 74159	PC1-8575	Definition – certified farm nutrient advisor	AMEND the Glossary of terms - Definition of Certified Farm Nutrient Advisor to clarify what qualifications a certified farm nutrient advisor has and what their role will be, enforcement, education, application. AND CLARIFY how many Certified Farm Nutrient Advisors will be needed and what it will cost the rate payers. AND AMEND to provide for any consequential or similar amendments, to give effect to the submission.	Support in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFNAs.
DairyNZ Submitter ID: 74050	PC1-10251	Definition – certified farm nutrient advisor	AMEND the definition of Certified Farm Nutrient Advisor to read: "Certified Farm Nutrient: is a person or entity certified... a. Has completed nutrient management training to at least <u>intermediate advanced level, and...</u> "	Support in part Oppose in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFNAs. FFNZ is concerned

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					that the advanced level is unnecessarily high and therefore opposes it.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10663	Definition – certified farm nutrient advisor	Undertake further consultation between the submitter and Waikato Regional Council to ensure a nationally consistent certification programme which meets Regional Council requirements is adopted for nutrient management advisors. AND AMEND the definition to read: "Certified Farm Nutrient Advisor is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a certified farm nutrient advisor and has the following qualifications and experience: a. Has completed nutrient management training to at least intermediate level, and b. Has experience in nutrient management planning." <u>"Certified Nutrient Management Advisor: is a nutrient management advisor certified under the Nutrient Management Advisor Certification Programme Ltd, or approved by the Chief Executive Officer of Waikato Regional Council as equivalent."</u> OR AMEND to read: <u>"Approved Nutrient Advisors: means Waikato Regional Council approved nutrient advisors listed on a register of approved providers on the Waikato Regional Council website."</u>	Support in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFNAs.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Fogarty, David Submitter ID: 73966	PC1-8421	Definition – certified farm nutrient advisor	AMEND Definition - Certified Farm Nutrient Advisor to ensure the positions are outside Council.	Support	FFNZ agrees that the CFNAs ought to be independent from Council.
Genetic Technologies Ltd Submitter ID: 73953	PC1-3290	Definition – certified farm nutrient advisor	AMEND to ensure that Certified Farm Nutrient Advisors have completed an advanced level of nutrient management training and have had at least 2 years' experience in nutrient management/farm systems advice.	Oppose	FFNZ considers that the advanced level is too high and will unnecessarily limit the pool of CFNAs.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10235	Definition – certified farm nutrient advisor	AMEND the definition of Certified Farm Nutrient Advisor to read: "Certified Farm Nutrient Advisor: is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a certified farm nutrient advisor and has the following <u>competencies qualifications and experience</u> : a. Has <u>completed nutrient management training to at least intermediate level, sufficient agronomic knowledge to conduct the assessment of a budget for the farm or enterprise, and</u> b. Has <u>experience in nutrient management planning the appropriate level of experience in the modelling tool utilised to develop the nutrient budget.</u> "	Support in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFNAs.
McGovern, Annette Submitter ID: 72969	PC1-8292	Definition – certified farm nutrient advisor	AMEND Definition - Certified Farm Nutrient Advisor to provide utmost clarity and allow for a sufficient pool of certified persons to be available to the market	Support in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to reflect that certified persons will be added to the Council website once PPC1 is operative.		stringent as to unreasonably limit the pool of available people to be CFNAs.
New Zealand Institute of Primary Industry Management - Waikato Branch Submitter ID: 73558	PC1-8446	Definition – certified farm nutrient advisor	AMEND Definition – Certified Farm Nutrient Advisor to read: "Certified Farm Nutrient Advisor: is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a certified farm nutrient advisor and has the following qualifications and experience: a. Has completed nutrient management training to at least intermediate level, and b. Has <u>a minimum of two years'</u> experience in nutrient management planning."	Support in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFNAs.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4673	Definition – certified farm nutrient advisor	AMEND the Definition of Certified Farm Nutrient Advisor to read: "Certified Farm Nutrient Advisor: is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a certified farm nutrient advisor that has the following qualifications..."	Support in part Oppose in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFNAs. In principle, FFNZ supports the certification of CFNAs as it means that Council does not have control over the NRP or other actions by the CFNA (see FFNZ's submission on Variation 1).
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8884	Definition – certified farm nutrient advisor	DELETE from the Glossary of terms the definition of a Certified Farm Nutrient Advisor, If the alternative approach not accepted then AMEND the definition	Oppose in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>of Certified Farm Nutrient Advisor to read: "Certified Farm Nutrient Advisor: is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a Certified Farm Nutrient Advisor and has the following qualifications and experience: a. Has completed nutrient management training to at least intermediate level, and a person who has both Holds a <u>Certificate of Completion in Sustainable Nutrient Management in New Zealand Agriculture and a Certificate of Completion in Advanced Sustainable Nutrient Management from Massey University; and</u> b. Has experience in nutrient management planning." AND CONSIDER reference in the definition to other qualifications applicable to other predominant land uses may be appropriate, for example horticulture.</p>		stringent as to unreasonably limit the pool of available people to be CFNAs.
Ravensdown Limited Submitter ID: 74058	PC1-10199	Definition – certified farm nutrient advisor	<p>DELETE the definition of Certified Farm Nutrient Advisor and replace it with the following definition: <u>Certified Nutrient Management Advisor</u>: is <u>nutrient management adviser certified under the Nutrient Management Adviser Certification Programme Ltd. Or approved by the Chief Executive Officer of Waikato</u></p>	Support in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFNAs.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Regional Council as equivalent. (see http://www.nmacertification.org.nz for details)."		
Reeve, Jocelyn Margaret Submitter ID: 73109	PC1-10049	Definition – certified farm nutrient advisor	AMEND the definition of Certified Farm Nutrient Advisor by using an agreed term for Certified Farm Environment Planner and Certified Farm Nutrient Advisor after consultation with existing industry certification schemes AND AMEND to ensure existing professional organisation certification lists are used.	Support in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFNAs.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8494	Definition – certified farm nutrient advisor	AMEND the definition of Certified Farm Nutrient Advisor as follows: "is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a certified farm nutrient advisor has the following qualifications and experience: means a person that holds a Certificate of Completion in Advanced Sustainable Nutrient Management in New Zealand Agriculture from Massey University: a. Has completed nutrient management training to at least an intermediate level, and has been certified by the New Zealand Institute for Primary Industry Management as meeting the criteria for a 'Certified Dairy Farm System Consultant'; or b. Has experience in nutrient management planning holds any other	Oppose	In principle, FFNZ supports the certification of CFNAs as it means that Council does not have control over the NRP or other actions by the CFNA (see FFNZ's submission on Variation 1). FFNZ opposes the amendments on the basis that they will unreasonable raise the bar and reduce the pool of people available to be CFNA and will unreasonably increase the cost of obtaining an NRP and engaging a CFNA.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>qualification, that has been approved by the Chief Executive of Waikato Regional Council has being an equivalent standard with respect to the knowledge and competencies required."</u>		
Waipa District Council Submitter ID: 67704	PC1-3239	Definition – certified farm nutrient advisor	Rationalise the definitions of 'Certified Farm Nutrient Advisor' and 'Certified Nutrient Management Advisor' in the Regional Plan and PPC1 so they are the same.	Support in part Oppose in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFNAs. FFNZ considers that this reasonably necessitates separate definitions but that the same person can be both.
Waipapa Farms Ltd and Carlyle Holdings Ltd Submitter ID: 73863	PC1-4628	Definition – certified farm nutrient advisor	AMEND Definition- Certified Farm Nutrient Advisor such that the definition provides clarity and allows for a sufficient pool of certified persons to be available to the market.	Support in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFNAs.
Waitomo District Council Submitter ID: 73688	PC1-10851	Definition – certified farm nutrient advisor	Rationalise the definitions of 'Certified Farm Nutrient Advisor' and 'Certified Nutrient Management Advisor' in the Regional Plan and PPC1 so they are the same.	Support in part Oppose in part	In principle, FFNZ supports clarity around CFNAs and qualifications to ensure fair, robust and cost effective NRP (provided it is only used as a reference point and not to benchmark nitrogen) and FEP regime but considers they should not be so stringent as to unreasonably limit the pool of available people to be CFNAs. FFNZ considers that this reasonably necessitates separate definitions but that the same person can be both.
Williams, Sam Joseph Submitter ID: 74198	PC1-5959	Definition – certified farm nutrient advisor	AMEND clause a. of the Definition of Certified Farm Nutrient Advisor to read "Has completed nutrient management training to at least <u>intermediate advanced level..."</u>	Oppose	FFNZ considers that the advanced level is unnecessarily and unreasonably high and will unreasonably raise the cost of engaging a CFNA and obtaining a NRP and limit the pool of people available to do a CFNA.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND to ensure a Certified Farm Nutrient Advisor and a Certified Farm Environment Planner meet the same criteria.		
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6265	Definition – Certified Industry Schemes	AMEND PPC1 to include better and further particulars regarding the timing, certification and implementation of Certified Industry Schemes.	Support in part	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. FFNZ supports the amendments to the extent that they ensure reasonable standards and conditions are applied to the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules).
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10665	Definition – Certified Industry Schemes	AMEND the Definition of Certified Industry Scheme/s to read: "Certified Industry Scheme/s: is a scheme <u>adopted in collaboration with industry and that has been certified approved</u> by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as meeting the assessment criteria and requirements set out in Schedule 2 of Chapter 3.11."	Support in part	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. FFNZ supports the amendments to the extent that they ensure reasonable standards and conditions are applied to the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules).
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10583	Definition – Certified Industry Schemes	AMEND the Glossary of terms definition of Certified Industry Scheme to read: "Certified Industry Scheme: is a scheme that has been certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional	Support in part	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. FFNZ supports the amendments to the extent that they ensure reasonable standards and conditions are applied to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			Council website as meeting the assessment criteria and requirements <u>standards</u> set out in Schedule 2 of Chapter 3.11."		the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules).
McGovern, Annette Submitter ID: 72969	PC1-8286	Definition – Certified Industry Schemes	REMOVE Definition - Certified Industry Scheme and any Objectives, Policies and Rules linked to it, until further assessment and consultation is undertaken to fully understand the intent, scope and application of a Certified Industry Scheme.	Oppose	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.
Mercury NZ Limited Submitter ID: 73182	PC1-9684	Definition – Certified Industry Schemes	AMEND in Glossary of terms the definition of Certified Industry Scheme to read: "Certified Industry <u>Sector</u> Scheme/s is a scheme..."	Support in part	If "sector" more appropriately reflected the CIS, FFNZ would support it.
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11202	Definition – Certified Industry Schemes	AMEND PPC1 to include better and further particulars regarding the timing, certification and implementation of Certified Industry Schemes.	Support in part	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent. FFNZ supports the amendments to the extent that they ensure reasonable standards and conditions are applied to the CIS and FEPs prepared in accordance with it and to ensure consistency (both between schemes and between schemes and the rules).
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8497	Definition – Certified Industry Schemes	DELETE the definition for Certified Industry Schemes.	Oppose	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Waipapa Farms Ltd and Carlyle Holdings Ltd Submitter ID: 73863	PC1-4623	Definition – Certified Industry Schemes	REMOVE the definition of Certified Industry Scheme and any Objectives, Policies and Rules linked to it, until further assessment and consultation is undertaken to really understand the intent, scope and application of a Certified Industry Scheme.	Oppose	In principle, FFNZ supports the CIS as an alternative option for those farmers who would rather deal with their industry body than with Council and as a permitted activity option for farmers who would rather meet permitted standards than apply for consent.
Allen, John Submitter ID: 73734	PC1-4932	Definition – commercial vegetable production	AMEND Definition - Commercial Vegetable Production by defining what constitutes a 'commercial' vegetable grower as distinct from a small scale grower who sells excess produce to a retail outlet or at their farm gate. AND AMEND by providing a definition based on the area under cultivation and parallels the small and low intensity farmer (Rule 1): " <u>Definition: Commercial vegetable production >= 1000 square metres of land in production at any one time.</u> "	Support in part	FFNZ supports reasonable clarification of the line between “commercial” and non commercial.
Gourmet Mokai Ltd Submitter ID: 73795	PC1-7253	Definition – commercial vegetable production	AMEND the definition of commercial vegetable production so as not to include those vegetables grown in glass houses or otherwise under cover.	Support in part Oppose in part	FFNZ supports reasonable clarification of the line between “commercial” and non commercial. FFNZ considers that may be a better distinction unless there is a justifiable basis to treat glass houses differently.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10231	Definition – commercial vegetable production	REMOVE asparagus from the definition of Commercial vegetable production.	Support in part	FFNZ would support removal of asparagus if it was more akin to cropping or something else reasonably defined in the plan.
Pukerimu Farms Limited Submitter ID: 73073	PC1-4814	Definition – commercial vegetable production	Definition - Commercial vegetable production. REMOVE the arbitrary delineation between different forms of cropping that in reality have very similar effect. The definitions would	Support in part Oppose in part	FFNZ would support a more appropriate basis of defining or managing arable cropping. However it considers that BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			become unnecessary if the land use change rule is deleted and replaced with region wide Best Management practice based rules as proposed.		through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).
Rickman, Antony Scott Submitter ID: 74162	PC1-9008	Definition – commercial vegetable production	AMEND the definition of a Commercial Vegetable Production by excluding asparagus. AND AMEND PPC1 to consider asparagus as pip fruit and kiwifruit.	Support in part	FFNZ would support removal of asparagus if it was more akin to cropping, fruit or something else reasonably defined in the plan.
Strang and Strang Limited Submitter ID: 73851	PC1-5580	Definition – commercial vegetable production	REMOVE from the definition of Commercial Vegetable Production the arbitrary delineation between different forms of cropping that in reality have very similar effects.	Support in part Oppose in part	FFNZ would support a more appropriate basis of defining arable cropping and/or commercial vegetable production.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8498	Definition – commercial vegetable production	AMEND the definition for commercial vegetable production so the listed vegetables are examples, not a definitive list.	Support in part	FFNZ agrees that the list ought not to be exhaustive but that it ought to be reasonably inclusive
Tuaropaki Trust Submitter ID: 73769	PC1-3029	Definition – commercial vegetable production	REMOVE glasshouse/covered grown vegetables from the definition for commercial vegetable production.	Support in part Oppose in part	FFNZ supports reasonable clarification of the line between “commercial” and non commercial. FFNZ considers that may be a better distinction unless there is a justifiable basis to treat glass houses differently.
Waiawa Farms Submitter ID: 71346	PC1-5853	Definition – commercial vegetable production	REMOVE the arbitrary delineation between different forms of cropping that have very similar effects. (Definition - Commercial vegetable production)	Support in part Oppose in part	FFNZ would support a more appropriate basis of defining arable cropping and/or commercial vegetable production.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Gavins Limited Submitter ID: 73846	PC1-5506	Definition – cultivation	ADD to definition of cultivation " <u>...includes minimum tillage and strip tillage.</u> "	Support in part Oppose in part	FFNZ considers that the definition ought to be amended to clarify that it excludes farm practices that do not require tillage e.g. hay making (see FFNZ's submission on Variation 1).
Genetic Technologies Ltd Submitter ID: 73953	PC1-3336	Definition – cultivation	AMEND the Definition of Cultivation to exclude minimum tillage and strip tillage.	Oppose in part	FFNZ considers that the definition ought to be amended to clarify that it excludes farm practices that do not require tillage e.g. hay making (see FFNZ's submission on Variation 1).
Henderson, Neville James Submitter ID: 72016	PC1-7436	Definition – cultivation	RETAIN in the definition of cultivation the inclusion of direct drilling and re-contouring of land.	Oppose in part	FFNZ considers that the definition ought to be amended to clarify that it excludes farm practices that do not require tillage e.g. hay making (see FFNZ's submission on Variation 1).
Paterson, Chris and Amy Submitter ID: 73368	PC1-2312	Definition – cultivation	AMEND the Definition of Cultivation to include strip tillage into the definition of cultivation that is excluded.	Support in part	FFNZ considers that the definition ought to be amended to clarify that it excludes farm practices that do not require tillage e.g. hay making (see FFNZ's submission on Variation 1).
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8678	Definition – cultivation	DELETE (a)-(c) from the definition for cultivation.	Oppose	FFNZ considers that a reasonable definition ought to be provided. FFNZ considers that the definition ought to be amended to clarify that it excludes farm practices that do not require tillage e.g. hay making (see FFNZ's submission on Variation 1).
Dairy Goat Co-Operative (N.Z) Ltd Submitter ID: 74044	PC1-4127	Definition – dairy farming	RETAIN the definition for Dairy Farming.	Support	FFNZ agrees that a reasonable definition ought to be retained.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8685	Definition – dairy farming	AMEND the definition for dairy farming to ensure that all activities associated with dairy farming and those that occur outside the milking season are included.	Oppose	FFNZ supports the definition as worded.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10666	Definition – diffuse discharges	AMEND the definition of Diffuse Discharge/s to read: " For the purposes of Chapter 3.11, means the discharge of contaminants that results from land use activities including cropping and the grazing of livestock and includes non point source discharges Means losses to the environment which are not from a point source, and have potential to contribute to a cumulative impact on the receiving environment." If deemed necessary to have a unique definition for Chapter 3.11, then AMEND the Definition to read: "For the purposes of Chapter 3.11, means the <u>discharge of contaminants losses</u> that results from land use activities, including cropping, forestry and the grazing of livestock, and includes which are not from non point source discharges and have potential to contribute to a cumulative impact on the receiving environment."	Oppose in part	FFNZ is concerned that this enlarges the present definition or creates further ambiguity and therefore does not support it.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8694	Definition – diffuse discharges	RETAIN the definition for diffuse discharge/s	Support in part	FFNZ considers a reasonable definition of diffuse discharge ought to be adopted.
Fertiliser Association of New Zealand	PC1-10668	Definition - drain	AMEND the definition for Drain to read: "For the purposes of Chapter 3.11, means an artificially created	Oppose	FFNZ does not agree with qualifying or narrowing the definition of drain

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73305			<u>open</u> channel designed to lower the water table and/or reduce surface flood risk but does not include any modified (e.g. straightened) natural watercourse."		
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8696	Definition - drain	RETAIN the definition for drain	Support in part	FFNZ considers a reasonable definition of drain ought to be adopted.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8697	Definition – drystock farming	RETAIN the definition for drystock farming.	Support in part	FFNZ considers a reasonable definition of drystock farming ought to be adopted.
Mangakotukutuku Stream Care Group Incorporated Submitter ID: 72412	PC1-4477	Definition – edge of field mitigations	AMEND the Edge of Field Mitigation/s definition AND/OR ADD a NEW term/definition that specifically relates to the function that these areas have in reducing contaminant losses to offsite surface waters (eg, 'Contaminant Mitigation Zone' - permanently or intermittently wet areas, shallow water, bogs, wet gully bottoms, swamps and seeps which have the potential to reduce losses of contaminants from farm land to surface water).	Oppose in part	In principle, FFNZ would support a reasonable definition of edge of field mitigation but does not support this submitter's proposal or the proposal to create buffers or contaminant mitigation zones for similar reasons as the reasons FFNZ opposes the changes to the definition of wetland.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Miraka Limited Submitter ID: 73492	PC1-8903	Definition – edge of field mitigations	AMEND to clarify the definition of edge of mitigation/s.	Support in part	FFNZ considers a reasonable and clear definition of edge of field mitigations ought to be adopted but without being unnecessarily prescriptive or restrictive.
Pouakani Trust Submitter ID: 73785	PC1-13137	Definition – edge of field mitigations	AMEND to clarify the definition of Edge of field mitigation/s.	Support in part	FFNZ considers a reasonable and clear definition of edge of field mitigations ought to be adopted but without being unnecessarily prescriptive or restrictive.
Pouakani Trust Submitter ID: 73785	PC1-6488	Definition – edge of field mitigations	AMEND the Glossary of terms to clarify the definition of Edge of field mitigation/s.	Support in part	FFNZ considers a reasonable and clear definition of edge of field mitigations ought to be adopted but without being unnecessarily prescriptive or restrictive.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8698	Definition – edge of field mitigations	RETAIN the definition for edge of field mitigation/s	Support in part	FFNZ considers a reasonable and clear definition of edge of field mitigations ought to be adopted but without being unnecessarily prescriptive or restrictive.
Waikato Regional Council Submitter ID: 72890	PC1-3667	Definition – edge of field mitigations	AMEND the Glossary definition of Edge of field mitigation/s to clarify which actions or technologies will be considered for funding in Method 3.11.4.5(g). AND AMEND to clarify the definition of edge of field in the definition section.	Support in part	FFNZ considers a reasonable and clear definition of edge of field mitigations ought to be adopted but without being unnecessarily prescriptive or restrictive. FFNZ considers it inappropriate to define in the plan which mitigations will be considered for funding as this may change with technology and should not have to go through a Schedule 1 process.
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6266	Definition – enterprise	AMEND to provide confirmation that the term 'enterprise' is not restricted to a single dairy unit and may include more than one dairy unit in circumstances where the land is held in single ownership to support the principal land use.	Support in part Oppose in part	FFNZ agrees that flexibility ought to be provided for enterprise to include more than a single dairy unit or other farm unit. However, FFNZ does not support the underlined wording as it considers that it ought to be boarder than “one owner” or “one dairy unit.”

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND the definition of 'Enterprise/s' to read as follows (or similar to address reasons for submission): "Enterprise/s: means one or more parcels of land held in single or multiple ownership <u>under the ultimate common control of one owner to support the principal land use, which may include more than one dairy unit, or land which the principal land use is reliant upon, and constitutes a single operative unit for the purposes of management. An enterprise is considered to be within a sub-catchment if more than 50% of that enterprise is within the sub-catchment, <u>except that where the enterprise falls within more than one sub-catchment it may nevertheless be treated as a single enterprise.</u>"</u>		FFNZ agrees with the wording at the end of the definition and considers that it should also be clarified that the 50% assessment is only for assessing priority (see FFNZ's submission on Variation 1).
Genetic Technologies Ltd Submitter ID: 73953	PC1-3338	Definition – enterprise	AMEND the Definition of enterprise/s to: " <u>one or more parcels of land within the same sub-catchment</u> ".	Oppose in part	FFNZ considers that the parcel of land should be able to be in more than one sub-catchment.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10232	Definition – enterprise	AMEND the definition of Enterprise/s to read: "Enterprise/s: means one or more parcels of land <u>(or parts of parcels of land)</u> held in single or multiple ownership <u>to support the primary production activities undertaken principle land use or land which the principle land use is reliant upon,</u> and constitutes a single operating unit for the purposes of management. An	Support in part Oppose in part	FFNZ agrees that the definition of enterprise should provide for multiple parcels of land but the sub-catchment assessment should be the purposes of determining priority (see FFNZ's submission on Variation 1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			enterprise is considered to be within a sub-catchment if more than 50% of that enterprise is within the sub-catchment."		
Kilgour, Gareth Submitter ID: 72950	PC1-1950	Definition – enterprise	AMEND Definition - Enterprise/s to ensure that only properties that are under the same ownership and are operationally dependent on each other are defined as an enterprise.	Oppose in part	FFNZ considers that appropriate flexibility ought to be provided in terms of ownership e.g. two different companies or partnerships could form the same enterprise.
Maniapoto Maori Trust Board Submitter ID: 73730	PC1-9368	Definition – enterprise	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses,</u> and constitutes a single..."	Support in part	In principle, FFNZ supports including the land uses associated with the enterprise
Maungatautari Marae Submitter ID: 73990	PC1-11769	Definition – enterprise	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses,</u> and constitutes a single..."	Support in part	In principle, FFNZ supports including the land uses associated with the enterprise
McGovern, Annette Submitter ID: 72969	PC1-8293	Definition – enterprise	AMEND Definition - Enterprise to apply only to properties in the same ownership and that have an operational dependency on each other.	Oppose in part	FFNZ considers that appropriate flexibility ought to be provided in terms of ownership e.g. two different companies or partnerships could form the same enterprise.
McLean, Parekawhia Submitter ID: 73359	PC1-11919	Definition – enterprise	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses,</u> and constitutes a single..."	Support in part	In principle, FFNZ supports including the land uses associated with the enterprise
Miraka Limited Submitter ID: 73492	PC1-8904	Definition – enterprise	RETAIN the definition of enterprise.	Support in part	FFNZ considers that a sentence needs to be added at the end to clarify that the 50% is for the purposes of assessing priority (see FFNZ's submission on Variation 1).
Ngaati Tamaoho Trust Te Taiao Roopuu	PC1-11618	Definition – enterprise	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant	Support in part	In principle, FFNZ supports including the land uses associated with the enterprise

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 74088			upon, <u>including associated land uses,</u> and constitutes a single..."		
Ngati Haua Iwi Trust Submitter ID: 73515	PC1-11869	Definition – enterprise	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses,</u> and constitutes a single..."	Support in part	In principle, FFNZ supports including the land uses associated with the enterprise
Pamu Farms of New Zealand Submitter ID: 74000	PC1-5752	Definition – enterprise	AMEND in the Glossary of terms the Definition of Enterprise/s to clarify and allow for further analysis of the refined term, its application and implications.	Oppose in part	FFNZ considers that certainty is needed around the definition and it could only be later "refined" through a Schedule 1 process. FFNZ considers that a sentence needs to be added at the end to clarify that the 50% is for the purposes of assessing priority (see FFNZ's submission on Variation 1).
Poohara Marae Submitter ID: 73545	PC1-12045	Definition – enterprise	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses,</u> and constitutes a single..."	Support in part	In principle, FFNZ supports including the land uses associated with the enterprise
Pouakani Trust Submitter ID: 73785	PC1-13138	Definition – enterprise	RETAIN the definition of Enterprise.	Support in part	FFNZ considers that a sentence needs to be added at the end to clarify that the 50% is for the purposes of assessing priority (see FFNZ's submission on Variation 1).
Pouakani Trust Submitter ID: 73785	PC1-6490	Definition – enterprise	RETAIN in the Glossary of terms the definition of Enterprise.	Support in part	FFNZ considers that a sentence needs to be added at the end to clarify that the 50% is for the purposes of assessing priority (see FFNZ's submission on Variation 1).
Raukawa Charitable Trust Submitter ID: 74073	PC1-10585	Definition – enterprise	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses,</u> and constitutes a single..."	Support in part	In principle, FFNZ supports including the land uses associated with the enterprise
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11203	Definition – enterprise	Provide confirmation that the term 'enterprise' is not restricted to a single dairy unit and may include more than one dairy unit in circumstances where	Support in part Oppose in part	FFNZ agrees that flexibility ought to be provided for enterprise to include more than a single dairy unit or other farm unit. However, FFNZ does not support the underlined wording as it considers that it ought to be boarder than "one owner" or "one dairy unit."

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>the land is held in single ownership to support the principal land use. AND AMEND the definition of 'Enterprise/s' to read as follows (or similar to address reasons for submission): "Enterprise/s: means one or more parcels of land held in single or multiple ownership <u>under the ultimate common control of one owner or entity</u> to support the principal land use, <u>which may include more than one dairy unit</u>, or land which the principal land use is reliant upon, and constitutes a single operative unit for the purposes of management. An enterprise is considered to be within a sub-catchment if more than 50% of that enterprise is within the sub-catchment, <u>except that where the enterprise falls within more than one sub-catchment it may nevertheless be treated as a single enterprise if the land parcels are contiguous.</u>"</p>		<p>FFNZ agrees with the wording at the end of the definition and considers that it should also be clarified that the 50% assessment is only for assessing priority (see FFNZ's submission on Variation 1).</p>
<p>Taupo Lake Care Incorporated Submitter ID: 61093</p>	PC1-9053	Definition – enterprise	<p>AMEND to provide an acceptable method catering for enterprises that cross catchment borders and work with Taupō Lake Care Inc to develop this AND advocate for a national solution to this problem.</p>	Support in part	<p>FFNZ considers that enterprise should not be limited to properties within the same sub-catchment. FFNZ considers that a sentence needs to be added at the end to clarify that the 50% is for the purposes of assessing priority (see FFNZ's submission on Variation 1).</p>
<p>Te Arawa River Iwi Trust Submitter ID: 73697</p>	PC1-11819	Definition – enterprise	<p>AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses</u>, and constitutes a single..."</p>	Support in part	<p>In principle, FFNZ supports including the land uses associated with the enterprise</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Te Awamaarahi Marae Trustees Submitter ID: 74168	PC1-11951	Definition – enterprise	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses</u> , and constitutes a single..."	Support in part	In principle, FFNZ supports including the land uses associated with the enterprise
Te Kauri Marae Submitter ID: 74124	PC1-11669	Definition – enterprise	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses</u> , and constitutes a single..."	Support in part	In principle, FFNZ supports including the land uses associated with the enterprise
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8699	Definition – enterprise	RETAIN the definition for enterprise/s.	Support in part	FFNZ considers that a sentence needs to be added at the end to clarify that the 50% is for the purposes of assessing priority (see FFNZ's submission on Variation 1).
Tuwharetoa Maori Trust Board Submitter ID: 73356	PC1-10629	Definition – enterprise	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses</u> , and constitutes a single..."	Support in part	In principle, FFNZ supports including the land uses associated with the enterprise
Waikato and Waipa River Iwi Submitter ID: 74035	PC1-3674	Definition – enterprise	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses</u> , and constitutes a single..."	Support in part	In principle, FFNZ supports including the land uses associated with the enterprise
Waikato Regional Council Submitter ID: 72890	PC1-3671	Definition – enterprise	AMEND the Glossary definition of Enterprise to clarify the scope and nature of an enterprise. AND AMEND the definition of Enterprise to read: " <u>for the purposes of Chapter 3.11</u> , means one or more parcels..." AND DELETE the words " principle " and replace with " <u>principal</u> ".	Support in part	FFNZ agrees that this definition ought to be for the purposes of chapter 3 and that the word "principle" amended. FFNZ also considers that a sentence needs to be added at the end to clarify that the 50% is for the purposes of assessing priority (see FFNZ's submission on Variation 1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Waipapa Farms Ltd and Carlyle Holdings Ltd Submitter ID: 73863	PC1-4636	Definition – enterprise	AMEND Definition- Enterprise/s to only apply to properties in the same ownership and have an operational dependency on each other.	Oppose in part	FFNZ considers that appropriate flexibility ought to be provided in terms of ownership e.g. two different companies or partnerships could form the same enterprise.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8700	Definition – Escherichia coli (E. coli)	RETAIN the definition for Escherichia coli.	Support in part	FFNZ supports a reasonable definition of E coli.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8701	Definition – Farm Environment Plans	RETAIN the definition for Farm Environment Plan/s.	Support in part	FFNZ supports a reasonable definition of FEPS and considers the notified definition appropriate as long as the changes proposed in FFNZ's submission on Variation 1 are made e.g. policies 2A and 2B, purpose of FEP section in Schedule 1 etc..
Black Jack Farms Submitter ID: 72028	PC1-8061	Definition – farming activities	AMEND the definition for farming activities so that it is confined to commercial activities.	Oppose in part	FFNZ considers that the rules ought to apply to all farming activities regardless of whether they are commercial. However, FFNZ considers that the rule and policy framework ought to be amended as proposed in its submission to ensure a reasonable approach for all farming activities that takes into account size, intensity and effects.
Taupo District Council Submitter ID: 74207	PC1-8171	Definition – farming activities	RETAIN the definition for farming activities, AND AMEND to clarify whether the harvesting of grass (cut and carry) is considered growing of crops, AND AMEND to exclude the use of stock to reduce grass cover for fire	Support in part Oppose in part	FFNZ supports a reasonable definition of farming activities. It consider that harvesting grass should not be considered growing of crops. FFNZ does not agree to the use of sock for fire reduction purposes and considers that PC1 ought to apply to all farming activities regardless of the purpose. FFNZ also considers that the notified exclusion of crops on

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			reduction purposes from farming activities.		land irrigated by consented municipal wastewater discharges ought to be deleted.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8702	Definition – farming activities	REMOVE the growing of crops on land irrigated by municipal wastewater discharge from the definition of farming activities.	Support	FFNZ agrees that this exclusion ought to be deleted.
Waipa District Council Submitter ID: 67704	PC1-3241	Definition – farming activities	AMEND the Glossary of terms to rationalise the definitions of 'Farming Activities' in PPC1 and the Waikato Regional Plan so that they are the same.	Support in part Oppose in part	FFNZ considers the proposed definition is appropriate but sees benefit in having a consistent term but only if it is appropriate in both contexts.
Waitomo District Council Submitter ID: 73688	PC1-10853	Definition – farming activities	AMEND the glossary of terms to rationalise the definitions of 'Farming Activities' in PPC1 and the Waikato Regional Plan so they are the same.	Support in part Oppose in part	FFNZ considers the proposed definition is appropriate but sees benefit in having a consistent term but only if it is appropriate in both contexts.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10576	Definition – five year rolling average	AMEND the Glossary of terms definition of five-year rolling average to read: " Five <u>Three</u> -year rolling average: means the average of modelled nitrogen leaching losses predicted by OVERSEER from the most recent 5 <u>3</u> years <u>using the most recent version of OVERSEER to model each of the three years and the same input data for each of the three years as was used to first calculate the nitrogen leaching losses for that year.</u> " AMEND Rules 3.11.5.2 to 3.11.5.6 as necessary to ensure data required for the calculation of the three year	Oppose	FFNZ considers a five year rolling average ought to be adopted for reasons including to provide flexibility for things like drought which cause spikes or anomalies. FFNZ opposes changes to the definition or rules to refer to a three year rolling average.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			rolling average is collected from the date of decisions on PPC1 are issued.		
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8934	Definition – five year rolling average	DELETE from the Glossary of terms the definition of the five year rolling average and the use of the term from PPC1.	Oppose	FFNZ considers a five year rolling average ought to be adopted for reasons including to provide flexibility for things like drought which cause spikes or anomalies.
Ravensdown Limited Submitter ID: 74058	PC1-10200	Definition – five year rolling average	AMEND definition of five-year rolling average to read: “means the average of modelled nitrogen leaching losses predicted estimated by OVERSEER from the most recent 5 years.”	Support	FFNZ agrees that Overseer estimates not predicts or measures nitrogen.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8703	Definition – five year rolling average	RETAIN the definition of five-year rolling average.	Support	FFNZ considers a five year rolling average ought to be adopted for reasons including to provide flexibility for things like drought which cause spikes or anomalies.
Genetic Technologies Ltd Submitter ID: 73953	PC1-3341	Definition – forage crop	ADD to the Definition for forage crops the words: " <u>Excluding annual and/or permanent ryegrass.</u> "	Support in part	In principle FFNZ agrees that it should not include paddocks grazed by stock
Kilgour, Gareth Submitter ID: 72950	PC1-1953	Definition – forage crop	AMEND Definition - Forage Crop to exclude the growing of grass for the purposes of hay or silage.	Support in part	In principle FFNZ agrees that it should not include paddocks grazed by stock, including harvesting of hay
McGovern, Annette Submitter ID: 72969	PC1-8295	Definition – forage crop	AMEND Definition - Forage Crop to explicitly exclude the growing of grass for the purposes of hay or silage.	Support in part	In principle FFNZ agrees that it should not include paddocks grazed by stock, including harvesting of hay
New Zealand Grain and Seed Trade Association	PC1-1680	Definition – forage crop	AMEND the definition of forage crop for clarification and interpretation to understand how the clause in Rule	Support in part	In principle FFNZ agrees that it should not include paddocks grazed by stock, including harvesting of

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 71229			3.11.5.2 no winter forage crops grazed in situ should work. Clarify what is a forage crop and how is this determined. A forage crop is determined as any feed that is accumulated and fed to animals by the animal foraging and may be conserved as silage or hay. By definition this then includes pasture species as well as other crops that have been grown in the past for winter feed.		hay and this should be excluded so as to ensure that rule does not apply.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8704	Definition – forage crop	RETAIN the definition for forage crop.	Support in part	FFNZ supports a reasonable definition of forage crop but considers that it should not include paddocks grazed by stock, including harvesting of hay
Waipapa Farms Ltd and Carlyle Holdings Ltd Submitter ID: 73863	PC1-4638		AMEND the Definition - Forage Crop to explicitly exclude the growing of grass for the purposes of hay or silage.	Support in part	In principle FFNZ agrees that it should not include paddocks grazed by stock, including harvesting of hay
AFFCO New Zealand Limited Submitter ID: 74140	PC1-7678	Definition – forage crop	DELETE the definition for good management practice and REPLACE with the definition of Best Practicable Option from the Resource Management Act 1991.	Support in part	In principle, FFNZ supports BPO as long as it is on a MPA (or similar basis, see FFNZ's submission on Variation 1) and not on an input basis. However, FFNZ also sees merit in reasonably defining GMP provided that the focus is on managing , reducing or minimising risks.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-7095	Definition – good management practices	AMEND the Definition of Good Management Practice to read: "For the purposes of Chapter 3.11... contaminants entering a water body and practices described in the	Support in part	FFNZ sees merit in reasonably defining GMP provided that the focus is on managing , reducing or minimising risks and reasonable industry agreed GMP is adopted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			document entitled 'Industry-agreed Good Management Practices relating to water quality' - dated September 2015". AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.		
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10660	Definition – forage crop	ADOPT one definition of Good Management Practice in preference to a specific interpretation for Chapter 3.11 alone.	Support in part	FFNZ sees merit in limiting the definition to this chapter to avoid unintended consequences elsewhere in the regional plan.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10233	Definition – good management practices	RETAIN the definition of Good Management Practice/s.	Support in part	FFNZ sees merit in reasonably defining GMP provided that the focus is on managing , reducing or minimising risks and reasonable industry agreed GMP is adopted.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8937	Definition – forage crop	DELETE from the Glossary of terms - Good Management Practice AND REPLACE with Best Practicable Option as defined by the Resource Management Act 1991.	Support in part	In principle, FFNZ supports BPO as long as it is on a MPA (or similar basis, see FFNZ's submission on Variation 1) and not on an input basis. However, FFNZ also sees merit in reasonably defining GMP provided that the focus is on managing , reducing or minimising risks.
Reeve, Jocelyn Margaret Submitter ID: 73109	PC1-10047	Definition – good management practices	AMEND the definitions for Best Management Practice and Good Management Practice to combine them into one.	Oppose	FFNZ considers that BMP and GMP are different and should be separate and the definition of BMP ought to be deleted.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8193	Definition – forage crop	AMEND the definition of good management practice/s to read: " For the purposes of Chapter 3.11, means industry-agreed and approved practices and actions undertaken on a property or enterprise that reduce or minimise the risk of contaminants entering a water body Means the practices set out in Schedule YY"	Oppose	FFNZ sees merit in reasonably defining GMP provided that the focus is on managing , reducing or minimising risks but does not support the prescribing the practices or the schedule YY proposed by this submitter.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND ADD a NEW Schedule YY to set out the expectations for good management practice including enforceable standards and measures AND AMEND to require the adoption of good management practice by all landowners and, if necessary work towards best management practice AND AMEND objectives and policies to ensure that all landowners have to achieve good management practices by 2019.		
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11017	Definition – livestock crossing structure	AMEND Definition - Livestock crossing structure with detailed specifications of the structure required, which rely on the risk factors for adverse effects arising including the type of stock crossing, the land use, and the frequency of use AND AMEND to ensure it does not include structures which require livestock to pass through the flow of the water, such as submerged in-stream platforms.	Oppose	FFNZ considers that this would be too onerous and result in an onerous obligation for crossing.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8706	Definition – livestock crossing structure	RETAIN the definition for livestock crossing structure.	Support in part	FFNZ supports a reasonable, practical and affordable definition of livestock crossing structure.
Waikato Regional Council	PC1-3672	Definition – livestock	AMEND the Glossary definition of Livestock Crossing Structure to read: “means a lawfully established	Support	FFNZ supports flexibility in the crossing structure and this may not involve the “installation” of a structure.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 72890		crossing structure	structure installed to allow that enables livestock to cross a water body.”		
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8708	Definition – mahinga kai	RETAIN the definition for mahinga kai.	Support in part	FFNZ supports a reasonable definition of mahinga kai.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8709	Definition – microbial pathogens	RETAIN the definition for microbial pathogens.	Support in part	FFNZ supports a reasonable definition of microbial pathogens.
Pamu Farms of New Zealand Submitter ID: 74000	PC1-5938	Definition – milking platform	AMEND in the Glossary of terms the Definition of Milking platform to accommodate integral cut and carry operations, variable support areas (and blocks) and how winter milking businesses operate, now and in the future. Council engagement to define this alongside industry.	Oppose in part	FFNZ is concerned about the implications of potentially widening the definition of dairy farms. If this would provide for greater flexibility it would support it but without knowing the implications it cannot support it.
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6284	Definition – nitrogen reference point	AMEND to provide (Definition - Nitrogen Reference Point) confirmation of which version of the OVERSEER Model applies and/or what 'other model approved by Council' will apply	Support in part Oppose in part	FFNZ considers that reasonable flexibility ought to be provided to use different Overseer versions and models to ensure the best “fit” to the particular farm. FFNZ agrees that consistency should be aimed for but also that there should be sufficient tailoring. A

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>AND AMEND to provide information on how it will ensure consistency for the purposes of Nitrogen Reference Point reporting, implementation, and compliance</p> <p>AND refer to relief sought above regarding data validation and need for auditing system for data set used for calculating a Nitrogen Reference Point.</p>		reasonable approach to auditing, monitoring and compliance ought to be adopted.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10669	Definition – nitrogen reference point	AMEND the Definition of Nitrogen Reference Point to reference the OVERSEER Data Input Standards and to Certified Nutrient Management Advisor, if the submission point on the certification scheme are accepted.	Support in part	FFNZ has no issue with a change in terminology if the outcome is the same.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10580	Definition – nitrogen reference point	<p>AMEND the Glossary of terms definition of Nitrogen Reference Point to read:</p> <p>"Nitrogen Reference Point: The nitrogen loss number (units of kg N/ha/year) that is derived <u>using the methodology specified in Schedule B.</u> from an OVERSEER use protocol compliant OVERSEER file that describes the property or farm enterprise and farm practices in an agreed year or years developed by a Certified Farm Nutrient Advisor, using the current version of the OVERSEER model (or another model approved by the Council) for the property or enterprise at the 'reference' point in time."</p>	Support in part	FFNZ would support the proposed changes provided that sufficient flexibility is provided in Schedule B for other models, changes in input standards/data and recognition of mitigations outside of overseer to provide for reasonable flexibility and tailoring.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10234	Definition – nitrogen reference point	RETAIN the definition of Nitrogen Reference Point that provides for the establishment of an alternative method or model to establish a benchmark nitrogen and phosphorus discharge for commercial vegetable production systems.	Support in part	FFNZ supports retaining the definition provided that flexibility is provided provide for NRPs for parts of a property or farm enterprise and other versions can be used.
Miraka Limited Submitter ID: 73492	PC1-8905	Definition – nitrogen reference point	AMEND to clarify the definition of Nitrogen Reference Point by including the specific version of the OVERSEER Model.	Oppose in part	FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4674	Definition – nitrogen reference point	AMEND the Definition of Nitrogen Reference Point to read: "The nitrogen loss number (units of kg N/ha/year)... the OVERSEER model (or the standalone pig module) or another model approved by the..."	Support in part	FFNZ agrees that amendments ought to be made to ensure sufficient tailoring to the particular farm involved e.g. allowing for a pig module for pig farming
Oceanview Farms Limited (Submitter 1) Submitter ID: 74131	PC1-7480	Definition – nitrogen reference point	REMOVE from PPC1 the use of the OVERSEER Model as the primary model for deriving a nitrogen loss number from a farming activity AND AMEND PPC1 so the 10 year plan relies only on good management practice to reduce contaminants entering waterways AND CONSIDER undertaking research and analysis over the next 10 years on approaches to contaminant management for all	Support in part	FFNZ supports Overseer as an on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			activities in the catchment, urban and rural.		
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8941	Definition – nitrogen reference point	DELETE the definition of the Nitrogen Reference Point IF the alternative approach proposed in the submission is not accepted then AMEND the definition of Nitrogen Reference Point to read: <u>"Nitrogen Reference Point means the nitrogen loss number (units of kg N/ha/year that is based on a nutrient management plan prepared annually in accordance with the Code of Practice for Nutrient Management (NZ Fertiliser Manufacturers Glossary One Plan- 2014 Glossary-11 Research Association 2007) which records (including copies of the OVERSEER input, output and parameter files used to prepare the plan in accordance with Overseer Best Practice Data Input Standards) and takes into account all sources of nutrients for intensive farming and identifies all relevant nutrient management practices and mitigations. It must be prepared by Certified Farm Nutrient Advisor."</u>	Oppose	FFNZ supports retaining the definition provided that flexibility is provided provide for NRPs for parts of a property or farm enterprise and other versions can be used.
Pamu Farms of New Zealand Submitter ID: 74000	PC1-5932	Definition – nitrogen reference point	AMEND in the Glossary of terms the Definition of Nitrogen Reference Point to separate temporal and model choice aspects, whilst retaining input quality protocols for alternative models.	Support in part	FFNZ would support the proposal if it provided greater flexibility and tailoring to the particular farm enterprise.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Pouakani Trust Submitter ID: 73785	PC1-13139	Definition – nitrogen reference point	AMEND to clarify which specific version of the OVERSEER Model is to be used in the definition of Nitrogen Reference Point.	Oppose in part	FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.
Pouakani Trust Submitter ID: 73785	PC1-6492	Definition – nitrogen reference point	AMEND in the Glossary of terms the definition of Nitrogen Reference Point to clarify which specific version of the OVERSEER Model is to be used.	Oppose in part	FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.
Ravensdown Limited Submitter ID: 74058	PC1-10202	Definition – nitrogen reference point	AMEND the definition of Nitrogen Reference Point as follows: <ol style="list-style-type: none"> 1. Refer to Schedule B that provides the process to determine the Nitrogen Reference Point 2. Reference OVERSEER Data Input Standards 3. Reference the Certified Nutrient Management Adviser Programme Clarify what 'protocol compliant' means	Support I part Oppose in part	F FFNZ supports retaining the definition provided that flexibility is provided provide for NRPs for parts of a property or farm enterprise and other versions can be used. FFNZ would support proposals 1, 2 and 3 provided that the changes FFNZ seeks to Schedule B and the policy an rule framework were also adopted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Shaw and Hall, Leigh Michael and Bradley John Submitter ID: 73858	PC1-2676	Definition – nitrogen reference point	DELETE Nitrogen Reference Point provisions.	Oppose in part	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as an on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11204	Definition – nitrogen reference point	Provide (Definition - Nitrogen Reference Point) confirmation of which version of the OVERSEER Model applies and/or what 'other model approved by Council' will apply. AND provide information on how it will ensure consistency for the purposes of Nitrogen Reference Point reporting, implementation, and compliance. AND refer to relief sought above regarding data validation and need for auditing system for data set used for calculating a Nitrogen Reference Point.	Support in part Oppose in part	FFNZ considers that reasonable flexibility ought to be provided to use different Overseer versions and models to ensure the best "fit" to the particular farm. FFNZ agrees that consistency should be aimed for but also that there should be sufficient tailoring. A reasonable approach to auditing, monitoring and compliance ought to be adopted.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8711	Definition – nitrogen reference point	AMEND the definition for Nitrogen Reference Point to read as follows: "Nitrogen Reference Point: The nitrogen loss number (units of kg N/ha/year) that is derived from an OVERSEER use protocol compliant OVERSEER file that describes the property or farm enterprise and farm practices in an agreed year or years developed by a Certified Farm	Oppose	FFNZ supports retaining the definition provided that flexibility is provided provide for NRPs for parts of a property or farm enterprise and other versions can be used. FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as an on farm decision support tool and considers it is appropriate for calculating the NRP provided that

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Nutrient Advisor, using the current version of the OVERSEER model (or another model approved by the Council) for the property or enterprise at the 'reference' point in time. <u>Nitrogen baseline means:</u> <u>a. the discharge of nitrogen below the root zone, as modelled with OVERSEER (where the required data is inputted into the model in accordance OVERSEER Best Practice Data Input Standards) or an equivalent model approved by the Chief Executive of Waikato Regional Council, averaged over a 24 month consecutive period covering two financial years 2014/2015 and 2015/2016 except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016, and expressed in kg per hectare per annum; and</u> <u>b[c]. if OVERSEER is updated, the most recent version is to be used to recalculate the nitrogen baseline using the same input data for the same period as used in (a) above."</u></p>		<p>flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ supports the use of the most recent version of Overseer provided that relativity between NRP and current discharges is maintained i.e. where there is no change in farm system changing Overseer version number should not change whether a farm continues to comply with its NRP. FFNZ also considers that paragraph c ought to provide for flexibility for alternative models or versions of Overseer where the current version creates anomalies or does not reasonably reflect the farm enterprise.</p>
Treweek, Glen Submitter ID: 72747	PC1-13140	Definition – nitrogen reference point	DELETE from Glossary of Terms the definition for a Nitrogen Reference Point AND ADD a definition for a Reference Land-use Description.	Oppose	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as an on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					<p>and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1).</p> <p>FFNZ does not support a land use description approach for reasons including that this is likely to be an allocation approach.</p>
<p>Waikato Regional Council Submitter ID: 72890</p>	<p>PC1-3673</p>	<p>Definition – nitrogen reference point</p>	<p>AMEND the Glossary definition of Nitrogen Reference Point to read: "The nitrogen loss number (units of kg N/ha/year) that is derived from an OVERSEER use protocol compliant OVERSEER® file that describes the property or farm enterprise and farm practices in an agreed year or years developed by a Certified Farm Nutrient Advisor, using the current version of the OVERSEER® model (or another model approved by the Council) for the property or enterprise at the "reference" point in time.</p> <p>is:</p> <p>1) <u>For commercial vegetable production, the average nitrogen leaching rate (in kilograms of nitrogen per hectare per year) predicted by modelling the nitrogen reference period data in the current version of OVERSEER®.</u></p> <p>2) <u>For all other land uses, the nitrogen leaching rate (in kilograms of nitrogen per hectare per year) predicted by modelling the Nitrogen Reference Point data in the current version of Overseer®.</u>"</p>	<p>Support in part</p>	<p>FFNZ would support the amendments if they achieved greater flexibility and tailoring of Overseer to the particular situation.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND AMEND the Glossary definition of Nitrogen Reference Point, to include changes that result from the incorporation of new land into a property and which are approved by the Council.		
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6286	Definition - offsets	RETAIN definition for offset/s, subject to relief sought above regarding definition of Best Management Practice.	Support in part	FFNZ considers that the definition ought to also apply for offsets of one contaminant for another in appropriate circumstances (see FFNZ's submission on Variation 1).
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11018	Definition - offsets	AMEND Definition - Offset/s to read: "Offset/s: For the purpose of Chapter 3.11 means for a specific contaminant/s an <u>measurable conservation action that reduces the intensity, extent and/or duration of residual adverse effects of that contaminant on water quality and achieves conservation outcomes above and beyond that which would have been achieved if the offset had not taken place.</u> "	Oppose	FFNZ considers that the use of offsets ought to be reasonable and practical and considers that the proposed changes are too onerous and restrictive.
Genesis Energy Limited Submitter ID: 74052	PC1-11303	Definition - offsets	AMEND the definition of 'offset' - "Offset means for a specific contaminant/s an action that reduces <u>some or all of the residual adverse effects of that contaminant on water quality.</u> "	Support in part	FFNZ agrees that flexibility ought to be provided for offsets in full or in part.
Kilgour, Gareth Submitter ID: 72950	PC1-1954	Definition - offsets	AMEND Definition - Offset/s to acknowledge that compensation measures may result in environmental benefits elsewhere.	Support in part	FFNZ supports consideration and availability of a range of mitigations, offsets or environmental compensation.
McGovern, Annette Submitter ID: 72969	PC1-8301	Definition - offsets	AMEND Definition - Offset/s to acknowledge that compensation measures may result in	Support in part	FFNZ supports consideration and availability of a range of mitigations, offsets or environmental compensation. FFNZ considers that the ability to

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			environmental benefits in other areas, and not necessarily for the same contaminant.		offset one contaminant for another ought to be provided for.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8946	Definition - offsets	AMEND in Glossary of terms the definition of Offset to read: "For the purposes of Chapter 3.11 means for specific contaminants <u>an alternative actions to achieve a prescribed obligation</u> that reduces residual adverse effects of that contaminant on water quality." AND AMEND PPC1 so that Offsets are available to all resource users.	Oppose	FFNZ considers that the proposed amendments will result in an unduly prescriptive approach and narrow available options. The available options ought to be flexible and broad
Southern Pastures Limited Partnership Submitter ID: 74062	PC1-11205	Definition - offsets	RETAIN definition for offset/s, subject to relief sought above regarding definition of Best Management Practice.	Support in part	FFNZ considers that the definition ought to also apply for offsets of one contaminant for another in appropriate circumstances (see FFNZ's submission on Variation 1).
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8719	Definition - offsets	DELETE the definition for offset/s.	Oppose	FFNZ considers that a range of mitigations, offsets or environmental compensation ought to be available.
Waipapa Farms Ltd and Carlyle Holdings Ltd Submitter ID: 73863	PC1-4640	Definition - offsets	AMEND Definition- Offset/s to acknowledge that compensation measures may result in environmental benefits in other areas (i.e not necessarily for the same contaminant).	Support in part	FFNZ supports consideration and availability of a range of mitigations, offsets or environmental compensation.
AFFCO New Zealand Limited Submitter ID: 74140	PC1-7515	Definition – point source discharges	AMEND the definition of Point source discharge/s to read as follows: "For the purposes of Chapter 3.11, means discharges from a stationary or fixed facility, including the irrigation onto	Support in part	FFNZ agrees that an appropriate definition of "regionally significant industry" ought to be adopted.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>land from consented industrial and municipal wastewater systems." AND ADD a definition for regionally significant industry to read as follows: "<u>Regionally significant industry- means industry based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes:</u></p> <ul style="list-style-type: none"> <u>a) dairy manufacturing sites;</u> <u>b) meat processing plants and rendering plants;</u> <u>c) wood processing plants; and</u> <u>c) mineral extraction activities."</u> 		
<p>Fonterra Co-operative Group Ltd Submitter ID: 74057</p>	<p>PC1-10593</p>	<p>Definition – point source discharges</p>	<p>DELETE the definition of Point Source Discharge in PPC1. "Point Source Discharge – For the purposes of Chapter 3.11, means discharges from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems" AND AMEND the definition of Point Source Discharge in the Waikato Regional Plan as follows: "Point Source Discharge – means discharges from a stationary or fixed facility <u>a discharge from a specific and identifiable outlet onto or into land, a water body, the air or the sea."</u></p>	<p>Support in part</p>	<p>FFNZ would support a reasonable definition of point source discharge that provided reasonable clarity for everyone as to what a point source discharge was.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			OR AMEND the definition of Point Source Discharge in PPC1 as follows: "Point Source Discharge: for the purposes of Chapter 3.11, means discharges from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems. A <u>discharge from a specific and identifiable outlet onto or into land, a water body or the sea.</u> "		
Hamilton City Council Submitter ID: 74051	PC1-11049	Definition – point source discharges	AMEND the definition of 'point source discharge' as follows; "For the purposes of Chapter 3.11, means discharges from a stationary or fixed <u>human-made</u> facility, including <u>a storm water outlet and</u> the irrigation onto land from consented industrial and municipal wastewater systems, <u>but does not include discharges from culverts unless the culvert is also a storm water outlet.</u> "	Support in part Oppose in part	FFNZ would support a reasonable definition of point source discharge that provided reasonable clarity for everyone as to what a point source discharge was.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8947	Definition – point source discharges	RETAIN in the Glossary of terms the definition of Point Source Discharges.	Support in part	FFNZ supports a reasonable definition of point source discharge that provided reasonable clarity for everyone as to what a point source discharge was.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8722	Definition – point source discharges	AMEND the definition for point source discharge/s to read: "For the purposes of Chapter 3.11 means discharge from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems. <u>Means a discharge from a specific</u>	Oppose in part	FFNZ supports a reasonable definition of point source discharge that provided reasonable clarity for everyone as to what a point source discharge was.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>and identifiable outlet onto or into land, a water body or the sea."</u>		
Waikato Regional Council Submitter ID: 72890	PC1-3680	Definition – point source discharges	AMEND the Glossary definition of Point Source Discharge/s to exclude infrastructure that provides a conduit for water flow (e.g. flood protection and land drainage infrastructure).	Support in part Oppose in part	FFNZ would support a reasonable definition of point source discharge that provided reasonable clarity for everyone as to what a point source discharge was.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-13141	Definition – point source discharges	AMEND the definition for 'point source discharges' to read: " Point-source discharge: For the purposes of Chapters 3.5 and 3.11, means <u>discharges associated with farming land use, and</u> discharges from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems."	Oppose	FFNZ does not agree that discharges associated with farming should be a point source discharge
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8723	Definition - restoration	RETAIN the definition for restoration.	Oppose	FFNZ considers the definition of restoration ought to be deleted (see FFNZ's submission on Variation 1).
Waikato Regional Council Submitter ID: 72890	PC1-3679	Definition - restoration	AMEND the definition of Restoration to read: " <u>for the purposes of Chapter 3.11,</u> is the process of..."	Oppose in part	FFNZ considers the definition of restoration ought to be deleted (see FFNZ's submission on Variation 1).
DairyNZ Submitter ID: 74050	PC1-10249	Definition - setback	AMEND the definition of setback to read: "Setback: means the distance from the <u>top of the bank bed</u> of a river or lake, or margin of a wetland <u>and</u> the activity specified in Chapter 3.11.	Support in part	FFNZ considers that the definition ought to refer to active river beds or permanent wetlands (see FFNZ's submission on Variation 1) but in the event FFNZ's submission point is not successful it would support this submission.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			(To assist interpretation of what is considered the top of banks of rivers, see Section 4.1 of this Plan)."		
Fullerton, Angela Margaret Submitter ID: 71297	PC1-6393	Definition - setback	AMEND the definition of setback and add a picture or drawing for clarity.	Support in part	FFNZ considers that the definition ought to refer to active river beds or permanent wetlands but in the event FFNZ's submission point is not successful it would support this submission.
Gavins Limited Submitter ID: 73846	PC1-5515	Definition - setback	AMEND setback definition to clarify what 'bed' is.	Support in part	FFNZ considers that the definition ought to refer to active river beds or permanent wetlands but in the event FFNZ's submission point is not successful it would support this submission.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8724	Definition - setback	RETAIN the definition for setback.	Oppose	FFNZ considers that the definition ought to refer to active river beds or permanent wetlands (see FFNZ's submission on Variation 1).
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11509	Definition – stock unit	DELETE Definition – Stock unit AND REPLACE with a definition that applies the OVERSEER Model Best Practice Data Input Standards OR ensure that weights and stock units reflect actual weights and appropriate stock units for the region and are consistent between drystock operations and dairy operations.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit.
Clarke, Hamish Submitter ID: 71621	PC1-8472	Definition – stock unit	AMEND the definition of Stock unit and Schedule B OVERSEER Model to use actual weights and therefore accurate stock unit measurements instead of defaults.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit.
Hurley, Peter James	PC1-1134	Definition – stock unit	AMEND Definition - Stock unit to use actual weights and accurate stock unit measurements.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 71391			AND AMEND to ensure that when the OVERSEER Model is used, best management practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters. AND MAKE any consequential amendments.	Oppose in part	FFNZ considers that reasonable flexibility ought to be provided in terms of models, mitigations outside of Overseer and Overseer version change to provide for reasonable tailoring to the farm enterprise.
Kilgour, Gareth Submitter ID: 72950	PC1-1956	Definition – stock unit	AMEND to refine the definition of stock unit and include categories for housed animals that are not grazed or accommodated on uncovered pasture 24 hours a day AND AMEND to reflect other management approaches AND CLARIFY the evidential basis for nitrogen outputs by animals other than beef and dairy which has informed the stock units.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit.
Lea, Charles Steven Submitter ID: 73903	PC1-3557	Definition – stock unit	AMEND definition of stock unit to use actual live weights.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit.
McGovern, Annette Submitter ID: 72969	PC1-8297	Definition – stock unit	AMEND Definition - Stock units, to include categories for housed animals where they are not grazing pasture for 24 hours a day, such as replacement calves, AND revise to reflect other management approaches.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit.
McGregor, Colin Grant Submitter ID: 73534	PC1-6657	Definition – stock unit	AMEND Definition - Stock unit to use actual weights and therefore accurate stock measurements, rather than standardised input parameters.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					FFNZ considers that reasonable flexibility ought to be provided in terms of models, mitigations outside of Overseer, changes to input data and standards, and Overseer version change to provide for reasonable tailoring to the farm enterprise.
McLaughlin, Kate Submitter ID: 72498	PC1-6347	Definition – stock unit	AMEND the Glossary of terms to REPLACE the Nitrogen Reference Point with provisions to allow nitrogen leaching to be monitored through stock units outlined in Farm Environment Plans.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit.
MD & CA Camp Submitter ID: 73799	PC1-5455	Definition – stock unit	AMEND Schedule B to change the Nitrogen Reference Point calculation from the years 2014/15 and 2015/16 to a 5 year rolling average AND ENSURE the OVERSEER Model is a more dependable reference.	Support in part	FFNZ agrees that Overseer ought to be calculated on a five year rolling basis but considers that the reference years also ought to be a 10 year period (see FFNZ's submission on Variation 1).
Murphy, William S Submitter ID: 72105	PC1-6503	Definition – stock unit	AMEND Definition - Stock unit to use actual weights and therefore accurate stock measurements, rather than standardised input parameters.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit.
New Zealand Pork Industry Board Submitter ID: 73780	PC1-4642	Definition – stock unit	AMEND the Definition of Stock Unit by adding a row in the Table as follows: Stock class "Pig," Number of Stock Units per animal " <u>17 total breeding animals/ha for a dedicated pig farm with no rotation; 21 total breeding animals/ha for a pig unit on a pastoral farm with a rotation every 2 years (minimum of 2 year return period); 24 total breeding animals/ha for a pig unit on a pastoral farm with a rotation every year (minimum of 1 year return period); 32 total breeding animals/ha for a pig unit on an arable</u>	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit and more appropriately provided for the pig industry.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			farm with a rotation at least every 2 years (minimum of 2 year return period)." Animal performance definition "Not applicable".		
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8948	Definition – stock unit	DELETE from the Glossary of terms the definition of Stock Unit OR AMEND so that the units and weights are appropriate for PPC1 and are consistent between drystock and dairy operations [submission refers to the proposed alternative approach].	Oppose	FFNZ considers that a robust, fit for purpose, reasonable, practical and affordable definition of stock unit.
Sellars, Michael David and Alison Jean Submitter ID: 72401	PC1-9179	Definition – stock unit	AMEND the Definition of 'Stock Units' to use a system of assessing impacts of stock carried.	Oppose	FFNZ considers that a robust, fit for purpose, reasonable, practical and affordable definition of stock unit.
Stokman, Mark and Sharon Submitter ID: 73976	PC1-6696	Definition – stock unit	AMEND Definition - Stock unit to use actual weights and therefore accurate stock measurements, rather than standardised input parameters.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit. FFNZ considers that reasonable flexibility ought to be provided in terms of models, mitigations outside of Overseer, changes to input data and standards, and Overseer version change to provide for reasonable tailoring to the farm enterprise.
Taylor and Mellow, Mary Jane and Carwyn David Submitter ID: 71441	PC1-1771	Definition – stock unit	AMEND the definition of a stock unit by using actual weights that provide accurate stock unit measurements under 'Definition - Stock Unit'.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit. FFNZ considers that reasonable flexibility ought to be provided in terms of models, mitigations outside of Overseer, changes to input data and standards, and Overseer version change to provide for reasonable tailoring to the farm enterprise.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Thomson, Peter Submitter ID: 71208	PC1-6085	Definition – stock unit	AMEND the Stock Unit definition so that actual weights are used and therefore actual stock unit measurements. AND AMEND the Stock Unit definition so that where OVERSEER is used the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing the use of standardised input parameters.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit. FFNZ considers that reasonable flexibility ought to be provided in terms of models, mitigations outside of Overseer, changes to input data and standards, and Overseer version change to provide for reasonable tailoring to the farm enterprise. FFNZ considers BMP is too high a standard and that it is more appropriate to adopt industry agreed GMP. However, this ought to be considered through non-regulatory methods and should not be part of the rule framework. FFNZ considers that GMP ought to be considered through application of the MPA framework FFNZ proposes for FEPs (see FFNZ's submission on Variation 1).
Thorburn, Matthew Charles and Susan Raewyn Submitter ID: 74043	PC1-6669	Definition – stock unit	AMEND Definition - Stock unit to use actual weights and therefore accurate stock measurements, rather than standardised input parameters.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit. FFNZ considers that reasonable flexibility ought to be provided in terms of models, mitigations outside of Overseer, changes to input data and standards, and Overseer version change to provide for reasonable tailoring to the farm enterprise.
Verry, Reon and Wendy Submitter ID: 72887	PC1-4000	Definition – stock unit	AMEND the Definition - Stock unit to use a more standard measurement.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit. FFNZ considers that reasonable flexibility ought to be provided in terms of models, mitigations outside of Overseer, changes to input data and standards, and Overseer version change to provide for reasonable tailoring to the farm enterprise.

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Waikato Regional Council Submitter ID: 72890	PC1-3681	Definition – stock unit	AMEND the definition of Stock unit to read: “...energy per year, as illustrated in <u>indetermined in accordance with</u> the following stocking rate table.” AND AMEND the definition to include an industry agreed stock unit criteria for pigs.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit. FFNZ considers that reasonable flexibility ought to be provided in terms of models, mitigations outside of Overseer, changes to input data and standards, and Overseer version change to provide for reasonable tailoring to the farm enterprise.
Waipapa Farms Ltd and Carlyle Holdings Ltd Submitter ID: 73863	PC1-4639	Definition – stock unit	AMEND the stock units under the definition, and include categories for housed animals where the animals are not grazed or accommodated on uncovered pasture 24 hours a day. This is particular the case for replacement calves that are accommodated in undercover facilities. AND AMEND to reflect other management approaches.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit. FFNZ considers that reasonable flexibility ought to be provided in terms of models, mitigations outside of Overseer, changes to input data and standards, and Overseer version change to provide for reasonable tailoring to the farm enterprise.
Wiremu Trust Submitter ID: 73969	PC1-8857	Definition – stock unit	AMEND Definition - Stock Unit to the Lincoln 2003 stock unit definition of a 450kg dairy cow producing 385 kgMS as 8.4 stock units.	Support in part	FFNZ would support this proposal if it resulted in a robust, fit for purpose, reasonable, practical and affordable definition of stock unit. FFNZ considers that reasonable flexibility ought to be provided in terms of models, mitigations outside of Overseer, changes to input data and standards, and Overseer version change to provide for reasonable tailoring to the farm enterprise.
Department of Conservation Submitter ID: 71759	PC1-8129	Definition – sub-catchment	AMEND the definition of 'Sub-catchment' to reinstate the number of sub-catchments to 74.	Support in part	FFNZ supports including all 74 sub-catchments subject to its concerns about the appropriate spatial scale for freshwater management as set out in its submission on Variation 1.
Mercury NZ Limited	PC1-9685	Definition – sub-catchment	AMEND in the Glossary of terms the definition of Sub-catchment to read:	Support in part	FFNZ supports including all 74 sub-catchments subject to its concerns about the appropriate spatial

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Submitter ID: 73182			"an area of land within the Waikato <u>or</u> <u>Waipā</u> River catchment ... draining to one of 69 locations." AND MAKE any consequential amendment to the total number of sub-catchments referenced in the definition as a result of submissions.		scale for freshwater management as set out in its submission on Variation 1.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11019	Consequential amendments to WRP	RETAIN, DELETE or AMEND provisions in Consequential amendments to Waikato Regional Plan to ensure they will, individually and collectively, give effect to substantive amendments sought by the submission and enable objectives to be achieved. AND RETAIN, DELETE or AMEND provisions to ensure that inconsistencies are resolved and that the more stringent provision prevails.	Oppose	FFNZ does not agree that the most stringent rule should apply. FFNZ considers that the most appropriate and relevant rule ought to apply.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5812	Consequential amendments to WRP	DELETE consequential amendments in Part D so that it is clear that the existing rules continue to apply to diffuse discharges OR AMEND to incorporate the relevant existing rules into Chapter 3.11 to form part of the activity standards.	Oppose	FFNZ supports the consequential amendments to part D.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8951	Consequential amendments to WRP	DELETE the consequential amendments so that it is clear that the existing rules continue to apply to diffuse discharges. OR AMEND so that the relevant existing rules are incorporated into Chapter 3.11 to form part of the permitted activity standards.	Oppose	FFNZ supports the consequential amendments to part D.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8725	Consequential amendments to WRP	RETAIN with any amendments necessary to be consistent with the relief sought in the submission.	Oppose	FFNZ does not support this submitter so does not support making amendments to be consistent with the relief it seeks.
Waikato Regional Council Submitter ID: 72890	PC1-3685	Consequential amendments to WRP	AMEND Consequential amendments to ensure the more stringent parts of 3.3.4.28 should have preference, and a new consequential amendment should be added to 3.3.4.28. AND AMEND Part D: Consequential amendment to rule 3.4.5.6 on page 90 to read: "Subject to compliance with any specified requirements, reporting through a Farm Environment Plan is a valid means of <u>supplying data under this rule to describe how irrigation water balances will be calculated and managed.</u> "	Support in part	FFNZ supports the consequential amendments to part D.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11402	Consequential amendments to WRP	RETAIN Consequential amendments to the Waikato Regional Plan as notified or amend by similar wording to like effect.	Support in part	FFNZ supports the consequential amendments to part D.
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9315	Readers guide	AMEND all references for Nitrogen Reference Point to Total Annual Nitrogen Discharge (TAND) or Nitrogen Discharge Allowance (NDA) per hectare AND AMEND all references to the Farm Environment Plan to Nutrient Management Plan (NMP)	Oppose	FFNZ supports the use of the NRP provided it is used as a reference point and not to grandparent nitrogen. FFNZ also supports Overseer as an on farm decision support tool and considers it is appropriate for calculating the NRP provided that flexibility is provided to recognise things like mitigations outside of Overseer, other models, changes in input standards, five year rolling average

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			AND ADD a regional council initiative to have national terms / acronyms for similar regulatory concepts.		and it is not used for enforcement and compliance (see FFNZ's submission on Variation 1). FFNZ opposes proposals to make this more stringent or to allocate nitrogen. FFNZ considers that all four contaminants ought to be "managed" and does not support a NMP.
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	PC1-11020	Management of water resources	AMEND the consequential amendment to Water Management Classes 3.2.4.1(e) to read: "... apply to a water body as well as policies in Section 3.11.3 for waterbodies in the Waikato and Waipā River catchments, when making decisions.... the same issue and are inconsistent particular regard...."	Oppose	FFNZ considers that the words ought to remain.
Fulton Hogan Limited Submitter ID: 74048	PC1-10885	Management of water resources	AMEND 3.2 Water Management Classes to read: "In Chapter 3.11, Fresh Water Management Units and associated water quality targets <u>objectives</u> have been established for the Waikato and Waipā River catchments. Within the Waikato and Waipā River catchments, these <u>objectives</u> targets are used in decision-making processes guided by the objectives in Chapter 3.14 and for future monitoring ... it is not intended, nor is it in the nature of water quality targets, that they be used directly...".	Support in part	FFNZ supports amendments to ensure consistency in terminology and with the NPS-FM and because FFNZ does not support the adoption of 80 year targets (see FFNZ's submission on Variation 1.
GBC Winstone Submitter ID: 73992	PC1-3636	Management of water resources	AMEND Management of Water Resources 3.2 Water Management Classes as follows: "In Chapter 3.11, Fresh Water Management Units and	Support in part	FFNZ supports amendments to ensure consistency in terminology and with the NPS-FM and because FFNZ does not support the adoption of 80 year targets (see FFNZ's submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			associated water quality targets objectives have been established... Waipā River Catchments, these objectives targets are used in decision-making processes guided by the objectives in Chapter 3.14 and for future monitoring... pathogens it is not intended, nor is it in the nature of water quality targets , that they be used..."		
Mercury NZ Limited Submitter ID: 73182	PC1-9692	Management of water resources	RETAIN Consequential amendments management of water resources the text under the heading 'Freshwater Management Units' regarding the intention of water quality targets not to be used as water compliance limits/standards.	Support	FFNZ supports the consequential amendments FFNZ supports the intention that water quality targets are not to be used as water compliance limits/standards.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8952	Management of water resources	AMEND PPC1/3.2 Management of water resources consequential amendments by clarifying that the targets are goals and have been used only for the purpose of developing the PPC1 objectives and that they are not directly applicable to resource consent applications. AND DELETE the consequential amendments to 3.2.4.1 Management of water resources.	Support in part	FFNZ supports the intention that water quality targets are not to be used as water compliance limits/standards. FFNZ would support the proposed amendment to the extent it is consistent with its submission on Variation 1.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8953	Water takes	DELETE Consequential amendments to 3.3.3 - Water takes.	Support in part	In principle, FFNZ agrees that the water allocation chapter ought to stand alone unless and until it goes through a Schedule 1 process.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10594	Discharges	RETAIN one definition of Point Source Discharge in the Waikato Regional Plan by AMENDING the existing definition of Point Source Discharge in the Waikato Regional Plan as follows: "Point Source Discharge – means discharges from a stationary or fixed facility <u>a discharge from a specific and identifiable outlet onto or into land, a water body, the air or the sea.</u> "	Support in part	FFNZ would support a reasonable definition of point source discharge that provided reasonable clarity for everyone as to what a point source discharge was.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-13193	Discharges	AMEND the text of Background and Explanation as follows: Discharges associate with Farming Land Use in the Waikato and Waipā River Catchments Chapter 3.11 addresses the use of land for farming in the Waikato and Waipā River catchments including associated diffuse <u>discharges of nitrogen, phosphorus, sediment and microbial pathogens.</u> Chapter 3.11 <u>also contains objectives and policies that apply to point source discharges to land and water in the Waikato and Waipā River catchments.</u>	Support in part	FFNZ agrees that Chapter 3 ought to apply to all discharges not just discharges from farming activities.
Fulton Hogan Limited Submitter ID: 74048	PC1-10824	Discharges	AMEND Part D, Consequential amendments to the Waikato Regional Plan, 3.5 Discharges, Background and Explanation, to read: " <u>Discharges in the Waikato and Waipā River catchments associated with Farming Land Use.</u> Chapter 3.11 addresses the use of land for farming in the Waikato and	Support in part	FFNZ agrees that Chapter 3 ought to apply to all discharges not just discharges from farming activities.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>Waipā River catchments including associated diffuse <u>discharges of nitrogen, phosphorous, sediment and microbial pathogens</u>. Chapter 3.11 also contains objectives and policies that apply to point source discharges to land and water in the Waikato and Waipā River catchments."</p>		
<p>GBC Winstone Submitter ID: 73992</p>	<p>PC1-2972</p>	<p>Discharges</p>	<p>AMEND the consequential amendments to chapter 3.5 Discharges Background and Explanation to read: "<u>Discharges in the Waikato and Waipā River Catchments associated with Farming Land Use</u>." Chapter 3.11 addresses the use of land for farming in the Waikato and Waipā River catchments including associated diffuse <u>discharges of nitrogen, phosphorus, sediment and microbial pathogens</u>. Chapter 3.11 also contains objectives and policies that apply to point source discharges to land and water in the Waikato and Waipā River catchments." AND AMEND 3.5 Discharges Background and Explanation as follows: "<u>Discharges in the Waikato and Waipā River Catchments associated with Farming Land Use</u>" AND AMEND 3.5 Discharges Background and Explanation as follows: "Chapter 3.11 addresses the use...including associated diffuse <u>discharges of nitrogen, phosphorus, sediment and microbial pathogens</u>."</p>	<p>Support in part</p>	<p>FFNZ agrees that Chapter 3 ought to apply to all discharges not just discharges from farming activities.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<u>Chapter 3.11 also contains objectives and policies that apply to point source discharges to land and water in the Waikato and Waipā River catchments."</u>		
J Swap Ltd Submitter ID: 71618	PC1-6437	Discharges	AMEND the text of the Background and Explanation section of Section 3.5 as follows - "Discharges in the Waikato and Waipā River Catchments associated with Farming Land Use <u>Chapter 3.11 addresses the use of land for farming in the Waikato and Waipā River catchments including associated diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens.</u> <u>Chapter 3.11 also contains objectives and policies that apply to point source discharges to land and water in the Waikato and Waipā River catchments."</u>	Oppose	FFNZ considers that Chapter 3 ought to apply to all discharges not just farming
Mercury NZ Limited Submitter ID: 73182	PC1-9693	Discharges	AMEND Consequential amendments discharges Chapter 3.5 Background and Explanation to read: "Chapter 3.11. addresses the use of land for farming in the Waikato and Waipā catchments including associated diffuse discharges."	Oppose	FFNZ considers that Chapter 3 ought to apply to all discharges not just farming
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8954	Discharges	DELETE 3.5 discharges under consequential amendments. AND AMEND to clarify the relationship between Chapter 3.11	Oppose in part	FFNZ considers that 3.5 ought to be retained as long as the changes set out in FFNZ's submission on Variation 1 are made.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>and other chapters in the Waikato Regional Plan AND AMEND the Waikato Regional Plan Permitted Activity Rule 3.5.5.2- Discharge of feed pad and stand-off pad effluent onto land as follows: The discharge of feed pad and stand-off pad effluent to land outside the Lake Taupo Catchment and the subsequent discharge of contaminants to air is a permitted activity subject to the following conditions:</p> <ol style="list-style-type: none"> 1. The pad shall be sealed, so as to restrict seepage of effluent. The permeability of the sealing layer for such treatment or storage facilities shall not exceed 1x10⁻⁹ metres per second. 2. There shall be no run-off or discharge of pad effluent into <u>groundwater or surface water.</u> 3. Materials used to absorb pad effluent or the effluent itself when spread on land as a means of disposal shall not exceed the limit specified in Table 3-8 inclusive of any loading made under Rules 3.5.5.2, 3.5.5.3, 3.5.6.2 and 3.5.6.4. The pad shall be located at least: <ol style="list-style-type: none"> a. 20 metres from surface water; b. <u>150 metres from a residential building or any other building being part of a place of assembly on another site;</u> 		<p>FFNZ opposes the changes to rule 3.5.5.2 for reasons including that it considers there is no scope for this and considers it will result in significant cost for no net benefit.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p><u>c. 50 metres from a property boundary</u></p> <p>4. Any discharge of contaminants into air arising from this activity shall comply with permitted activity conditions in Section 6.1.8 of this Plan.</p> <p>5. The discharger shall provide information to show how the requirements of this rule are being met, if requested by the Waikato Regional Council.</p> <p>6. The discharge shall not occur within 20 metres of a Significant Geothermal Feature*.</p> <p>7. Where fertiliser is applied onto the same land on which farm animal effluent has been disposed of in the preceding 12 months, the application must be in accordance with Rule 3.9.4.11.</p> <p><u>8. Runoff from the surrounding catchment area is prevented from entering the feedlot or feed pad.</u></p> <p>AND ADD a NEW permitted activity rule for discharges from feed pads/feedlot rule [Schedule D of the submission] to read:</p> <p><u>"The use of land for the purpose of operating a feedlot is a permitted activity subject to the following standards:</u></p> <p><u>1. The land used for the feedlot shall be managed in a manner that prevents any seepage of contaminants into groundwater. The</u></p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>feedlot shall be located no less than 20m from any surface water body;</p> <p>2. The pad shall be located at least:</p> <p>a. 20 metres from surface water;</p> <p>b. 150 metres from a residential building or any other building being part of a place of assembly on another site;</p> <p>c. 50 metres from a property boundary</p> <p>3. Runoff from the surrounding catchment area is prevented from entering the feedlot or feed pad."</p>		
Stevenson Resources Limited Submitter ID: 73732	PC1-5749	Discharges	<p>AMEND the Consequential amendments 3.5 Discharges - Background and Explanation to read: "<u>Discharges in the Waikato and Waipā River Catchments associated with Farming Land Use.</u></p> <p>Chapter 3.11 addresses the use of land for farming in the Waikato and Waipā River catchments including associated diffuse <u>discharges of nitrogen, phosphorus, sediment and microbial pathogens.</u></p> <p>Chapter 3.11 also contains objectives and policies that apply to point source discharges to land and water in the <u>Waikato and Waipā River catchments.</u>"</p>	Support	FFNZ agrees that Chapter 3.11 ought to apply to all discharges not just farming.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8959	Non point source discharges	<p>DELETE the proposed consequential amendments to Chapter 3.9.</p> <p>AND AMEND to move the policies in Chapter 3.11 that only to only point source discharges to Chapter 3.9 of</p>	Oppose	FFNZ supports the consequential amendments to the extent they are consistent with its submission on Variation 1.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>the Existing Regional Plan to avoid any inconsistency. AND REMOVE all references to point source discharges from Chapter 3.11 except in Policies 10 to 12. AND AMEND Rule 3.9.4.11 Permitted Activity Rule - Fertiliser Application to require record of NPKS kg/ha/yr/date/proof of placement for compliance and Overseer audit as part of Nutrient Management Plan and, to refer to the most recent Code of Practice for Nutrient Management [as set out in Appendix Three-Schedule D of the submission]. AND AMEND Rule 3.9.4.11 Permitted Activity Rule - Fertiliser Application as follows: " A maximum nitrogen loading rate of fertilizer must not exceed 450 <u>120</u> kg/hectare/year for land grazed by livestock (applied to effective pastoral hectares) animal effluent irrigated. The maximum nitrogen loading rate should include all sources of applied nitrogen including fertilizer, biosolids and irrigated farm effluent."</p>		<p>FFNZ opposes the changes to make standards in rule 3.9.4.11 more stringent.</p>
<p>Mercury NZ Limited Submitter ID: 73182</p>	<p>PC1-9694</p>	<p>River and lake bed structures</p>	<p>AMEND Consequential amendments to River and Lake bed structures 4.2.10.1 (n) to read: "The structure shall be consistent with the provisions specified in the Water Management Classes in Section 3.2.4 of this Plan. and in the case of the Waikato and Waipā river</p>	<p>Oppose</p>	<p>FFNZ supports the consequential amendments to the extent they are consistent with its submission on Variation 1. FFNZ considers that Chapter 3.11 ought to apply to all land uses not just farming activities.</p>

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			catchments, the relevant water quality objective in chapter 3.11."		
Mercury NZ Limited Submitter ID: 73182	PC1-9695	River and Lake bed disturbances	AMEND Consequential amendments to River and Lake bed disturbance 4.3.3 Policy 1(b) to read: "b) does not degrade water quality and aquatic ecosystems in a manner that is inconsistent with policies in Section 3.2.3 and the objectives policies in Section 3.11.2." AND AMEND Consequential amendments to Table 4-1 - Priority Water Bodies for Livestock Exclusion, to remove any named/listed water bodies that are within the Waikato and Waipā River catchments.	Oppose in part	FFNZ supports the consequential amendments to the extent they are consistent with its submission on Variation 1. FFNZ considers that Chapter 3.11 ought to apply to all land uses not just farming activities and that the whole of it ought to apply not just policies or just objectives.
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8961	River and Lake bed disturbances	DELETE the consequential amendments - 4.3 River and lake bed disturbances AND AMEND PPC1 to make it clear that the River and lake bed disturbances provisions in Chapter 3.11 will only apply once they have been complied with, not in advance of the transition dates provided AND AMEND where appropriate to introduce the permitted activity standards associated with livestock in Chapter 4.3 of the existing Waikato Regional Plan to Chapter 3.11.	Oppose	FFNZ supports the consequential amendments to the extent they are consistent with its submission on Variation 1. FFNZ considers that Chapter 3.11 ought to apply to all land uses not just farming activities.
Mercury NZ Limited Submitter ID: 73182	PC1-9696	Accelerated Erosion	RETAIN the consequential changes to Chapter 5.1 Accelerated Erosion in same or similar form.	Support in part	FFNZ supports the consequential amendments to the extent they are consistent with its submission on Variation 1. FFNZ considers that Chapter 3.11

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
					ought to apply to all land uses not just farming activities.
Mercury NZ Limited Submitter ID: 73182	PC1-9697	Discharges into or onto land	AMEND Consequential amendments Discharges onto or into land 5.2.3 Policy 2(c) to read: "c) any effect on water quality or aquatic ecosystems that is inconsistent with the purpose of the Water Management Classes as identified by the policies in Section 3.2.3.3 or in the Waikato and Waipā River catchments, the water quality objectives policies in section 3.11.2.3."	Oppose in part	FFNZ supports the consequential amendments to the extent they are consistent with its submission on Variation 1. FFNZ considers that Chapter 3.11 ought to apply to all land uses not just farming activities and that the whole of it ought to apply not just policies or just objectives.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1-11510	Glossary of terms	ADD a NEW definition for 'Nutrient user groups' - a group of properties in multiple ownership, where the owners of those properties undertake farming activities and operate as a collective for the purposes of nutrient management. AND ADD a NEW definition for 'Critical Source Area' - a landscape feature like a gully, swale or a depression that accumulates runoff from an adjacent immediate area, and delivers it to surface waterways such as rivers and lakes, artificial waterways and field tiles; and areas which arise through land use activities and management approaches such as cultivation and winter grazing which result in contaminants being discharged from	Oppose in part	FFNZ does not support the addition of nutrient user groups which creates confusion and is unnecessarily and will potentially lead to allocation. FFNZ considers that PC1 should not define critical source area as this will most likely be a matter of interpretation and require sufficient tailoring to the particular situation. It would also be inflexible and inappropriate to define this term in a plan change as it will change and evolve over time and should not have to wait a Schedule 1 process to change. FFNZ supports a reasonable definition of BPO but prefers the definition in its submission on Variation 1. FFNZ opposes allocation (see its submissions on Variation 1 and Pc1) and therefore opposes the definitions proposed for loads.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			<p>the activity and being delivered to surface waterways.</p> <p>AND ADD a NEW definition for 'Best Practicable Option - Best Practicable option in relation to a discharge of a contaminant which may enter water, means the best Methods for preventing or minimising the adverse effects on the environment having regard, among other things, to -</p> <ul style="list-style-type: none"> (a) the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and (b) the financial implications, and the effects on the environment, of that option when compared with other options; and (c) the current state of technical knowledge and the likelihood that the option can be successfully applied. <p>AND ADD a NEW definition for 'In stream nitrate concentration limits (mg/L)' - the in-stream water quality concentrations required to achieve the identified water management Objective for the associated sub-catchment or Freshwater Management Unit.</p> <p>AND ADD a NEW definition for 'Allowable in stream nitrate load (tonnes per year)' - the allowable volume of nitrate-Nitrogen that can pass down the river at a particular point as determined from the in-</p>		

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
			stream nitrate-Nitrogen concentration limit. AND ADD a NEW definition for 'Maximum allowable zone load (MAZL)' - the amount of Nitrogen that can be lost below the root zone within a defined water management zone as determined by the in-stream nitrate load limit (adjusted for attenuation between the root zone and the river) AND ADD a NEW definition for 'Measured in-stream nitrate load (tonnes per year) - the amount of nitrate-Nitrogen measured (based on actual monitoring data) as passing down the river at a particular point.		
Fullerton, Angela Margaret Submitter ID: 71297	PC1-5691	Glossary of terms	ADD to Glossary of Terms a definition of 'water body' to clarify if the definition of water body includes man-made dams for drinking and or man-made ponds. AND AMEND definition of setback and add a picture or drawing for clarity. AND AMEND the definition of forage crop to capture crops grazed in winter in situ.	Oppose	FFNZ considers that water bodies ought to be limited to accord water bodies and setbacks ought to be reasonable and beyond minimum standards developed in FEPs and forage crops should not include crops grazed in situ in winter (see FFNZ's submission on Variation 1).
MD & CA Camp Submitter ID: 73799	PC1-5444	Glossary of terms	AMEND to clarify the definition of waterbodies in Schedule C (i), (ii), (iii), and (iv).	Support in part	FFNZ considers that water bodies ought to be limited to accord water bodies
Reeves and Taylor, James Gordon Livingston and Amy Louise Submitter ID: 71614	PC1-8548	Glossary of terms	AMEND the Glossary of Terms Definition - 75th percentile nitrogen leaching value to include all enterprises, including commercial vegetable growers, and point source dischargers.	Oppose	FFNZ considers that the 75 th percentile ought to be based on the dairy curve.

Submitter Name and Submission Number	Submission Point	Relevant Provision	Relief sought by submitter	Support or oppose	Reasons
Stevenson Resources Limited Submitter ID: 73732	PC1-5748	Glossary of terms	ADD to the Glossary of terms a definition of regionally significant industry that reads: <u>“Regionally significant industry: means an economic activity based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes:</u> <u>a) Dairy manufacturing sites;</u> <u>b) Meat processing plants;</u> <u>c) Pulp and paper processing plants;</u> <u>and</u> <u>d) Mineral extraction activities.”</u>	Support in part	FFNZ agrees that an appropriate definition of “regionally significant industry” ought to be adopted.