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Wairarapa Moana Incorporation.

Submission to Plan Change 1 (PC1) to the Waikato Regional Plan.

To:	Waikato Regional Council
Submitter:	Wairarapa Moana Incorporation (WMI)
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I confirm that I am authorised on behalf of WMI to make this submission.

WMI wishes to be heard in support of this submission.

WMI would consider presenting a joint case with Miraka Limited and would also supports other parties' submissions to the extent that their submissions are consistent with WMI's position.

WMI will not gain an advantage in trade competition through this submission.

Nick Hume

General Manager

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Introduction and Background

1.1 WMI is generally supportive of the work done by the CSG and Regional Council and supportive of the objectives to achieve the Vision and Strategy of Plan Change 1 (Plan Change or PC1).

1.2 WMI owns 11,700 hectares on farmland in South Waikato. The main land uses on this land are dairy farming, dry stock farming and forestry.

1.3 The land block that WMI owns is known as the Pouakani Block. The tribal affiliation is Ngāti Kahungunu me Rangitane ki Wairarapa.

1.4 WMI has not been formally consulted or engaged by the Regional Council on the Plan Change. The RMA section 7 requires councils to consult with local Tangata Whenua. WMI expect to be consulted directly in future under the RMA section 7 on any regional matters of control by WRC.

1.5 WMI's Commitment to Kaitiakitanga

WMI have 11,770 hectares (ha) of land in Mangakino. Of that land 4,221 ha is used for dairy farming, 1,305 ha is dry stock dairy support, 5,770 ha is in forestry and the balance of 474 ha is in riparian plantings or areas set aside for reserves.

WMI has a strong commitment to kaitiakitanga and is responsible on behalf of the owners (of which there are approximately 3,500) for nurturing and protecting the whenua for future generations. In this regard the significant forestry plantings assist in providing a balanced land use portfolio and makes a significant contribution to minimising the nutrient losses to the Waikato River.

WMI has also made a significant investment over the last 20 years upgrading infrastructure. WMI have built 11 new effluent ponds that are significantly above Regional Council suggested Best Practice including installing concrete underpasses and concrete cattle yards to contain effluent. WMI has planted a number of riparian areas and in addition set aside reserve areas of land to capture nutrient run off alongside the Waikato and Mangakino rivers.

WMI has been involved in a number of research projects related to understanding and reducing nutrient losses to gain a better understanding of how we can continue our commitment to kaitiakitanga and nurturing our whenua. Some of these projects have been in conjunction with Ag Research, MPI (The Sustainable Farming Fund) and Dairy NZ. WMI will continue this work into the future and will look to partner with other organisations to further develop new and improved practices. WMI see one of their roles as helping develop Best Practice for all the industries we are associated with.

WMI is a large supplier and shareholder of Miraka Limited and support the work it has done to date with the Clean Streams Accord and other initiatives. WMI are aware Miraka is submitting on the Plan Change and support its submission. WMI supports the Farming with Excellence program developed by Miraka known as "Te Ara Miraka". This program is seen as industry leading and has a strong focus on Kaitiakitanga and guardianship and WMI see this programme as a good guideline for the basis of an Industry Certified Scheme as defined by PC1.

It is important to note that being owners of Maori Freehold Land means that the land that WMI owns can never be sold and is to be held for future generations and our owners and Board take their responsibility seriously as kaitiaki (custodians) as the land will pass from generation to generation. WMI Lands need to be sustainable into the future and any future rule changes may impose a burden upon Maori Land Owners that they are unable to avoid. In a non-Maori land owner situation that owner can choose to sell and invest in land elsewhere should the rules imposed mean the land becomes non-economic and a burden to the owners.

Summary of Submission

WMI supports the overall intent of the Plan Change being the first stage of achieving the Vision and Strategy set in the Waikato River legislation.

However, WMI oppose the Plan Change on the following points:

a. **WMI opposes the current Freshwater Management Units as they are currently proposed as they are too large and do not take into consideration the unique physical attributes of properties within the catchment.**

WMI seeks to use of new defined sub catchments rather than the proposed FMUs (as per map 3.11-1) to set the target reductions in contaminant loss; to implement the plans; and to monitor the impacts of farm practice changes on water quality. WMI wants the current sub catchments redefined to align with physical attributes and not water monitoring sites. Having more consistent physical attributes across comparative farms will place greater emphasis on farm practice changes that are necessary by allowing appropriate benchmarking and Best Practice. Having smaller targeted FMUs will allow this to occur.

Summary Relief Sought – remove current FMUs and replace with new smaller FMUs based on new redefined sub catchments having similar physical attributes. Redefine the current sub catchments to align with physical attributes.

b. The current Plan Change makes no reference to the hydro dam system and any effect it has on water quality.

The dam system slows the flow of water and allows pooling of contaminants. The Plan Change focuses on what farmers will do to improve water quality. The water reading stations come into question with the dam system as the readings are altered by the dam system and the practices a farmer is conducting on the land might not have a direct bearing on water quality. WMI want a full investigation of the dam's effects on water quality under section 3.11.4.7 and potential amelioration of water quality standards / discharge reductions that farmers are expected to undertake in those catchments that are affected by hydro dams and by their impact on readings at monitoring sites.

Summary Relief Sought – Include a full investigation into the dam effects and ensure that information gathered is included used to support future allocations which will be will be addressed in a plan review which will be subject to full First Schedule RMA process.

c. WMI opposes the establishment of the 75th percentile approach and the use of OVERSEER as a compliance/ regulatory tool for the 75thpercentile, and seeks the removal of priority 1, 2 and 3 classifications for implementation.

WMI considers all four contaminants and their reduction as being equally important. Currently, the plan has an over emphasis on Nitrogen (N) loss and the establishment of the 75thpercentile for N reduces the importance of the other contaminants. Use of this instrument is inappropriate and will lead to inequity during the first 10-year phase. All farms in the catchment have the potential to reduce contaminants if emphasis is to be placed on management mitigation. Similarly, farms in all sub catchments should be required to complete and start implementing Farm Environment Plans (FEPs) by 1 July 2020.

OVERSEER should not be used as a compliance/regulatory tool because of its current weaknesses in dealing with many mitigating practices and the likelihood of on-going version changes. Rather, WMI endorses the use of this software program as a modelling tool to guide Best Practice in conjunction with Farm Environmental Planning and the use of Nitrogen Reference Points (NRP) as a means of establishing Best Practice or improvements in practice.

Summary Relief Sought – Removal of the 75thpercentile approach. All properties to submit a FEP by 1 July 2020. Restrict the use of OVERSEER as a planning and modelling tool only to be used within the Farm Environment Plans (FEP) using NRP as a Best Practice guidance.

d. Use of the term Land Suitability.

WMI considers that the use of the term and concept of "Land Suitability" as a means of future allocations of contaminant losses is premature and, therefore, inappropriate. More appropriate mechanisms may emerge as impact measurements are undertaken during the next 10 years and our understanding of sub catchment behaviour improves. Any future allocation method should be addressed in a plan review which should be subject to full First Schedule RMA process.

Summary Relief Sought – Remove any reference to the term Land Suitability and replace with "future allocation mechanism." Any future allocation method will be addressed in a plan review which will be subject to full First Schedule RMA process.

Decisions Sought

WMI seeks the following decision on its submission on the Plan Change, that the Waikato Regional Council:

- retain with amendments, or delete the various provisions of the Plan Change that are referred to in Attachment 1 of this submission, and;
- provides any further or other consequential or alternative relief that may be necessary to give effect to the relief sought in this submission.

No #	Section or Part	Position	Comments	Decision Sought
1	3.11	Oppose in Part	WMI support the area covered by the Plan Change. WMI oppose the use of Freshwater Management Units (FMUs) as shown in Map 3.11-1. FMUs should be established at a sub catchment level not at the scale identified in Map 3.11-1. The National Policy Statement for Freshwater Management 2014 requires the use of FMUs to enable the monitoring pf progress towards meeting targets. The size and variation between the current proposed FMUs is not consistent with other parts to the plan (in particular the references to sub catchment level in many parts of the plan). In order to identify poor practice on farm this change is required. Comments in submission number 15 (policy 8) expand further on this. The current sub catchment Map 3.11-2 needs to change. Sub catchment should be land areas that have similar physical attributes (ie: rainfall, soil type and drainage). Further work should be undertaken to determine sub catchments (and then converted into new FMUs). It would be beneficial to group the sub catchments listed in Map 3.11-2 into FMUs that have similar physical attributes in order to track the true progress of the Plan Change. For example, grouping same soil type with same rainfall areas would help determine if real progress is being made. In the short term that progress will be driven by behavioural changes on farm. This approach would identify poor practice within FMUs. As the FMUs stand at present in Map 3.11-1 a poor practice farmer would not be caught by the rules within the plan and would not change their practice. WMI oppose any reference to the use of the term "land suitability." Rather its reference should be replaced with "new allocation or management regime." The continued	1) Replace Map 3.11-1 with new sub catchment map. 2) Group the current sub catchment map 3.11-2 into similar physical attributes to form new FMUs. 3) Replace land suitability references with "new allocation or management regime to be determined by a full First Schedule RMA process before the next stage of PC 1 is implemented."

			use implies the decision has been made for the next stage after 2026 and land suitability will become the mechanism for allocation. WMI consider that it is premature to make this decision now and request a full First Schedule RMA process on this matter as more information becomes available. There are other methods of allocation that can be used.	
2	Objective 1	Support in part with amendment	WMI supports the timeframe of 80 Years. However, the FMUs as defined are not appropriate. This is outlined in submission points 14 and 15 (Policy 7 and 8).	1) Update FMU map to new redefined FMUs based on re-defined sub catchments taking into account the physical attributes of land areas.
3	Objective 2	Support		
4	Objective 3	Oppose and support in part with amendment	The target of 10% and 2026 timeframe are supported. However there needs to be clear monitoring of practice changes and water quality at a sub catchment level to gauge the impact of changes and inform future policies not at FMU but rather at sub catchment level, as outlined in other submission points. WMI support the inclusion of all contaminant discharges (nitrogen, phosphorus, sediment and microbial pathogens) within this objective. WMI is concerned majority of the plan focuses on nitrogen and does not deal directly with the other three contaminant discharges.	1) Amendment such that re-defined sub-catchments based on similarity of physical attributes are identified as the FMUs.
5	Objective 4	Support	The staged approach is supported.	
6	Objective 5	Support	WMI are supportive of this clause.	
7	Objective 6	Oppose	WMI support the inclusion of this area although we note this has been removed. WMI respect the position of the Hauraki Iwi Authorities and acknowledge that Regional Council needs to consult with that group. WMI would like to see the Plan Change placed on hold until this matter is resolved.	1) Place the Plan Change on hold until Hauraki Iwi Authorities have been consulted with and the area currently removed is included again.

8	Policy 1	Support in part with amendment	Supportive of a. and c. oppose b. in its current form. As outlined in further points to this submission, WMI see benefits being gained from all farmers focusing on Best Practice. The focus should not be just on the farms identified as moderate to high contaminant dischargers. Within the Plan Change there is a focus on Nitrogen with the establishment of nitrogen reference points (NRPs) and the 75thpercentile. It is not clear throughout the Plan Change how the other contaminant discharges will be reduced and their reductions measured.	1) Removal of b. and replace with "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)".
9	Policy 2	Support in part with amendment	Supportive of a, b, c, and e in full. Oppose d. WMI is concerned with the approach the Plan Change takes in relation to the focus on nitrogen. The only focus appears to be N and not all contaminants equally.	1) Amendment of clause d. in current form by replacing it to read "Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the difference between current practices and the application of Best Management Practices (those not currently applying mitigations expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and"
10	Policy 3	No Position		
11	Policy 4	Oppose in part	Supportive as long as the entity does not exceed its current discharge level. The concern is that any increase in discharge of N, P, sediments or microbial pathogens will add to the load in the catchment. The policy is not worded strongly enough to ensure there is no further contaminant discharges. In addition, there needs to be a requirement to prepare FEPs to include Best Practice Management Practices for all contaminant discharges.	1) The words "as long as there is no increase in discharges of nitrogen, phosphorus, sediment and microbial pathogens from property or enterprise." are inserted to the policy wording. 2) The inclusion of the wording "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".

12	Policy 5	Support in Part with amendment	WMI consider that the staged approach is important and would have concerns if there was not one. The wording needs to include economic hardship and not just social disruption. Farming is the largest contribution to the Waikato economy and any plan change focusing on changes of farming activities will affect the economy.	1) Insert the word economic hardship to read "Economic hardship and Social disruption...." To be consistent with other points in this submission.
13	Policy 6	Support	WMI fully supports this policy and would be concerned should any land use change be allowed that would add to the contaminant discharges.	
14	Policy 7	Oppose in part	There should be the inclusion of economic hardship alongside social disruption costs in part c of policy 7. Any future allocation needs to consider the economic cost on the region or sub catchment region. Any future allocation needs to also look at the productive performance and economic contribution to the region or sub catchment. Land suitability should not be decided as the future allocation framework with the limited information WRC have provided to date. WMI wants reference to this removed. In particular points made below in relation to policy 8. There is a possibility that high rainfall farms may be encouraged to reduce their output which might not be the right economic decision for the region or sub catchment. This Plan Change and any future plan change needs to have a focus on Best Management Practice not just the physical attributes of the land which is outlined within the current version of PC1. Land Suitability may have unintended consequences that delivers an inequitable result. Any future plan or allocation method needs to go through the full RMA consultation process as per PC1.	1) Remove any reference to Land Suitability. Replace with "future allocation method" 2) Add in the word Economic hardship to state "economic hardship and social disruption...." in part c of policy 7. 3) Remove footnote 5.

			In addition, in the future allocations the hydro dam system needs to be incorporated into the solution as they are adding to the problem. There is clear evidence that the dam system plays a direct role in what runs off the land and into the water and how the dams alter water quality with various containments. Dams slow the flow and allow containments to pool. WMI are also concerned about future rules in relation to climate change and greenhouse gas emissions and these and other legislative changes need to be balanced in "future allocations methods" in relation to future plan changes or a new Regional Plan. For example, future emission restrictions set by Central Government may have an effect on the region and compound the social and economic costs of the current Proposed Plan Change and any future plan changes.	
15	Policy 8	Oppose in Part	WMI is concerned that there is a constant reference and focus on Nitrogen within PC1. Other contaminant discharges are of equal importance to control. WMI expect all contaminants to be addressed in the Farm Environment Plans through the implementation of Best Practice by all properties or enterprises (accepting the less that 20ha exclusions). This is highlighted in this policy with a direct focus on a 75th percentile approach for N with no focus on other contaminant discharges. WMI believes the reference to FMU should be replaced with sub catchment. For example, with reference to Nitrogen, there are two fundamental drivers of loss from	1) All farms to submit and adhere to the FEP by the 1st July 2020. No priority 1, 2 and 3. There be no prioritisation of sub catchments. 2) Delete reference of 75th percentile. 3) Establishment of new sub catchments defined on physical attributes.

			the farming system: physical attributes of the farming environment (ie: rainfall, soil type and drainage) and farm management practices (eg: N inputs, effluent, etc.) Much of the farm to farm and catchment to catchment variation in estimated N losses will reflect the physical drivers which are fixed. What is not fixed and can be changed are farming practices and therefore the emphasis that PC 1 places on Farm Environmental Plans and Best Practice is appropriate. Given this situation the unfortunate consequence of focusing on farms that exceed the 75% quartile at FMU level is that significant gains that are possible on other farms will be ignored. Poor environmental practice can occur on farms that have low estimates of N loss that are simply the result of the physical attributes of the farm as described above. Similarly, if there is significant variation in physical attributes within a Freshwater Management Unit then the ranking of farms across quartiles can be misleading in terms of where absolute gains can be made from practice change over the next 10 years. WMI want the sub catchments to be re-established to align with the physical attributes of the land area. This will aid in benchmarking and identify practice improvements to reduce discharge of contaminants. Current sub catchments are aligned with water monitoring sights. WMI considers ranking the sub catchments as 1, 2 and 3 is not in line with the intent of the Plan Change as there may be some gains to be made from Best Practice implementation within sub catchments early in the period. All sub catchments contribute to water quality and any improvements in any sub catchment will contribute to overall improvements in water quality. All sub catchments should submit their FEP as early as priority 1.	

16	Policy 9	Support in Part with amendment	WMI are generally supportive of the policy but as per other points in the submission encourage the emphasis on Best Practice and suggest the addition of such.	1) Retain, with an additional part e. "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 all properties and enterprises in the region."
17	Policy 10	Support		1) Retain
18	Policy 11	Support		1) Retain
19	Policy 12	Support		1) Retain
20	Policy 13	Support	WMI support a, b and c	1) Retain
21	Policy 14	Support		1) Retain
22	Policy 15	Support		1) Retain
23	Policy 16	Support in Part with amendment	Within the wording of the policy there is reference to the term land suitability by stating "suitability for development" As per policy 7 comments WMI feel it is premature to refer to this term in this policy. To impose this term on this policy when it has not been agreed that this will be the future allocation rule is not acceptable.	1) Retain the policy, with the removal of clauses ii. on land suitability and iii. on the short term targets to be achieved in Objective 3.
24	Policy 17	Support		1) Retain
25	Implementation Methods	Oppose in Part and Support in Part with amendment	3.11.4.3 – WMI supports the tailored Farm Environment Plan approach to contaminant discharge mitigation, with clear parameters and requirements as outlined in this method. Further, WMI would like the regional council 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 easily included in all Farm Environment Plans and applied across all properties and enterprises within the region as an effective and relatively non-disruptive means to achieve the ten-year improvements in water quality. 3.11.4.7 - WMI supports the gathering of information but oppose the presumption that this will be based on land suitability. WMI want the effects of the hydro dam system	1) Remove the reference to land suitability in 3.11.4.7 to be consistent with other submission points. 2) Include in 3.11.4.7 a clause vi under section b. that states "Gather information and fully investigate the effects the hydro dam system has on water quality and water monitoring readings to better under in order to decide future allocations." 3) Retain supported Parts.

			included within that information gather stage. As per comments in point 14 on policy 7 the dam system effects water quality. WMI want a full investigation into the effects and how that relates to water monitoring and possible future allocations. 3.11.4.12 - WMI support the dissemination of Best Practice Guidelines (supporting submission 14), and when new methods are determined for managing discharges they will be incorporated into FEPs.	
26	Rule 3.11.5.1	Support	From a management point of view, it makes sense to exclude small and low intensity lands	1) Retain
27	Rule 3.11.5.2	Support		1) Retain
28	Rule 3.11.5.3	Oppose in Part	As per item 14 above (Policy 8) WMI suggest all properties or enterprises be treated the same and target be changed to 1 July 2020. The basis for this is that the sooner all begin work the closer we will get to the target. To be consistent with other points remove reference to 75thpercentile for N leaching.	1) Change implementation date for all sub catchments to 1 July 2020. Replace other dates in 5b and 5c. 2) Removal of the reference to 75th percentile.
29	Rule 3.11.5.4	Oppose in Part	Removal of 75th percentile reference and focus all to implement their Farm Environment Plans using Best Practice. As per previous item, target 1 July 2020.	1) Change implementation date for all sub catchments to 1 July 2020. 2) Removal of reference of 75th percentile.
30	Rule 3.11.5.5	No Position		
31	Rule 3.11.5.6	Support		1) Retain
32	Rule 3.11.5.7	Support	WMI considers that any increase in intensification that leads to increase in contaminant discharges from any farming system should be treated as a non-complying activity and consent will not be granted if there is an increase in losses. This rule needs to remain and needs to be enforced.	1) Retain
33	Rule3.11.5.5	No Position		
34	Rules Schedule A	Support		1) Retain

35	Rules Schedule B	Oppose in Part	OVERSEER should not be used as a compliance/regulatory tool because of its current weaknesses in dealing with many mitigating practices and the likelihood of on-going version changes. The NRP should be used as a determinant of Best Practice and how changes in practice will lead to less nitrogen losses. WMI place a heavy weighting on the FEPs and see Best Practice as a method of making improvements and ensuring all containments are focused on equally and would support the use of the NRP in this context not as a compliance tool. Use of OVERSEER as a compliance tool in this context only emphasises that focus on N over other containments which is not the intent of the Plan Change. WRC will have to offer guidance on version changes and missing data for recalibration of NRPs should OVERSEER versions change. WMI want to be able to use actual input data as opposed to default data as proposed. For example, WMI have 4 weather stations on the farm recording soil temperature, rainfall and humidity. The use of actual data should be encouraged where an entity can demonstrate they have reliable data.	1) Incorporate the NRP and use into the FEP as a Best Practice Management tool. 2) Develop protocol for use of actual data rather than just using default input settings within OVERSSEER. 3) Guidance on what version of OVERSEER the schedule refers to and clarification on how version changes will be handled with version changes.
36	Rules Schedule C	Support	WMI support the exclusion of stock to water bodies.	1) Retain
37	Schedule 1	Support in part with amendment	WMI supports the preparation, certification and requirements for Farm Environment Plans in Schedule 1, except for clause 5. (b): "Where the NRP exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of N is reduced so that it does not exceed the 75th percentile N leaching value by 1 July 2026...." WMI opposes the 75th percentile approach on two main grounds:	1) Removal reference to 75th percentile. 2) Removal of reference to land capability from 2 d. 3) Add a clause to the effect that the 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, land types and other biophysical factors and that such mitigating actions or measures are to be included in

			1. socio-economic equity and social disruption; and 2. impact on reducing contaminants discharge and improving water quality in the short term. WMI believes that a 75th percentile N leaching value approach contradicts Objective 4 and Policy 5, which call for a staged approach to change enabling people and communities to undertake adaptive management to continue to provide for their social, economic and cultural wellbeing in the short term. Given that the 75th percentile is calculated on a FMU basis, where there is likely to be a similarity of biophysical factors that affect leaching rates, it is possible that the 75th percentile NRP in a catchment with high 'natural' leaching and high levels of voluntary mitigation efforts and expenditure could be significantly higher than in an FMU where little has been done to mitigate leaching. Under the 75th percentile approach, and this scenario, farmers who have already done all they reasonably can in terms of mitigations could potentially be forced to de-stock or be forced off their land, causing immense social disruption and economic hardship in local communities. Further it is noted that N is not the key water quality issue for all sub-catchments, and therefore its reduction should not take precedence over the reduction of all other contaminant discharges. Neither is it appropriate to use N reduction as a proxy for the reduction of other contaminants; sediment discharge, for example, follows different pathways and requires different mitigations. WMI considers that the 10 year reductions in contaminants discharge and improvements in water quality would be better met through the combination of • no further intensification of land use through either land use change or increase from a property or enterprise's NRP as per FEP. • providing Best Practice management guidelines and examples of cost-effective mitigations that have the biggest	Farm Environment Plans and implemented on all properties and enterprises across the region.

			effect on improving water quality across a range of farming policies, land types and other biophysical factors • requirement for Farm Environment Plans to include Best Management Practices and for these to be implemented, with regulation and enforcement as required • application of Best Management Practices across the region, irrespective of priority sub-catchments and NRPs.	
38	Schedule 2	Support with amendment	WMI have a concern that there needs to be scrutiny of the proposed industry schemes to ensure that standards are maintained and are consistent with other approved industry schemes in the catchment on an ongoing basis.	1) WRC to ensure they have robust audit system for ongoing quality control of schemes.
39	Tables	Oppose	WMI opposes the FMUs as listed, as per other points in this submission. WMI want to see a focus on re-defined sub catchments.	1) Amend table 3.11-1 to provide attribute information at sub catchment scale.
40	Maps	Oppose in Part	WMI is not sure of reliability behind the establishment of the sub catchments maps overlaid with the results in the water reading tables. As outlined the hydro dam system has a bearing on these results and also protocols for sampling collection are not consistent across various sites (for example the exclusion of the Whakamaru results as outlined in the technical papers released by the Technical Leaders Group who reported to the CSG). WMI raise the point that all sub catchments be treated as Priority 1 if we want to move closer to achieving the Vision and Strategy sooner, and suggests that the sub catchments be re-established based on physical attributes and not monitoring sites.	1) Removal of Map 3.11-1 and replace with New Map 3.11-2. 2) Replacement of Map 3.11-2 with new defined sub catchments that align with physical attributes of the land.
41	Rule 5.1.4.11	Support		1) Retain

42	Glossary	Oppose in Part	WMI believe the definition of the 75 percentile is not required. WMI also raise the point that there is no definition of "properties" in the glossary yet it appears to be referenced in the Plan Change as it is highlighted in bold a number of sections.	1) Remove 75 percentile definition as per other points in this submission. 2) Supply definition of property to the glossary, with that definition being "one contiguous block of land owned by one common owner". That common owner definition should also be defined to be 100% ownership. 3) Define version of OVERSEER used for NRP and future versions. Define past, current and future.