



Federated Farmers of New Zealand

Further Submission on Otago Regional Council's Plan Change 8 – Water Quality

2nd October 2020



FURTHER SUBMISSION TO OTAGO REGIONAL COUNCIL ON PLAN CHANGE 8 (WATER QUALITY)

Form 6

Further submission in support of, or in opposition to, submission on publicly notified proposed policy statement or plan

Clause 8 of First Schedule, Resource Management Act 1991

To: *Otago Regional Council*
policy@orc.govt.nz

Name of further submitter: Federated Farmers of New Zealand

Contact person: Kim Reilly
Regional Policy Manager, South Island.

Address for service: kreilly@fedfarm.org.nz
PO Box 5242
Dunedin 9058

This is a further submission in response to submission/s made on the following proposed plan change – Plan Change 8 (Water Quality)

The following pages detail the specifics in relation to our support or opposition to various submissions lodged. Our further submissions include the particular parts of each submission supported or opposed alongside our reasons for that position and what decision we seek from the local authority.

I wish to be heard in support of my further submission.

Note to person making further submission

A copy of your further submission must be served on the original submitter within 5 working days after making the further submission to the local authority.

Where Federated Farmers submitted on the same variation point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers views on points raised by other submitters.

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Royal Forest and Bird Protection Society of New Zealand Inc	80082.04	Part A: Policy 7.D.5	Amend the policy to apply all 5 biophysical components of ecosystem health identified in Appendix 1A of the NPS Freshwater Management 2020.	Oppose in part	The relief sought goes beyond the intent of this plan change, which preceded the NPS Freshwater management 2020. It is more appropriately addressed in a holistic way when Council gives effect to the NPS FM 2020 in its forthcoming full plan review.
Beef + Lamb New Zealand	80084.04	Part A: Policy 7.D.5(d)(ii)	Amend by removing word "ongoing": The ongoing reduction of adverse environmental effects of the discharge, where the permitted activity rules and Schedule 16 discharge thresholds cannot be met ; and...	Support	Not feasible or necessary to always require "ongoing" reduction. Supported for similar reasons to that provided by the submitter.
New Zealand Pork Industry Board	80015.01	Part A: Policy 7.D.6	Expand the matters to have regard to, to include matters such as the value of investment (including mitigations), the gains achieved through good management practice and the positive effects of an activity.	Support	Support consideration of the positive effects of the activity, rather than just the negative ones proposed within the draft policy.
Balance Agri-Nutrients Ltd	80068.01	Part A: Policy 7.D.6	Amend as shown: <u>(a) Restrict the duration of resource consents to a term of no more than 40 years</u> <u>i. 35 years where the discharge will meet the water quality standard required to support that value for the duration of the resource consent;</u> <u>ii. 15 years where the discharge does not meet the water quality standard required to support that</u>	Support in part	The reasons proposed by the submitter are supported - the proposed relief provides for appropriate consent terms in a range of circumstances.

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<u>value but will progressively meet that standard within the duration of the resource consent; and</u> <u>iii. 5 years where the discharge does not meet the water quality standard required to support that value</u>		
Forest and Bird	80082.0 5	Part A: Policy 7.D.6	Amend as follows: <u>(a) Restrict the duration of resource consents to a term of no more than 5 40-years; and</u>	Oppose	Unnecessarily restrictive, onerous, and expensive for consent applications and resource users. Will also result in an increased administrative burden.
Otago and Central South Island Fish & Game	80080.0 3	Part A: Rule 12.C.0.2	Replace all instances of "Regionally Significant Wetland" with wetland	Oppose	Goes beyond intention of the plan change and will capture too many areas, with resulting restrictions on land beyond that intended or assessed within the 32 Report.
Otago and the Central South Island Fish & Game	80080.0 4	Part A: Rule 12.C.0.4	Replace all instances of "Regionally Significant Wetland" with wetland	Oppose	Goes beyond intention of the plan change and will capture too many areas, with resulting restrictions on land beyond that intended or assessed within the S32 Report.
Otago and the Central South Island Fish & Game	80080.0 6	Part A: Rule 14.7.2.1(d)(i)	Replace all instances of "Regionally Significant Wetland" with wetland	Oppose	Goes beyond intention of the plan change and will capture too many areas, with resulting restrictions on land beyond that intended or assessed within the s32 Report.
Ravensdown Ltd	80038.1 6	Part B: Definition - Suitably	Amend as shown: <u>A person that is has been assessed and approved by the Otago Regional Council as being appropriately qualified,</u>	Support	More appropriately reflects the need for objective assessment of the expertise, qualifications, competence, and experience rather than assessment of those matters by

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
		Qualified Person	<u>experienced and competent in the relevant field of expertise.</u>		Council, who may not have sufficient industry knowledge to assess and determine such matters.
Otago Regional Council	80042.1 6	Part B: Definition: Dairy Effluent Storage Calculator	Amend as shown: <u>Available from Otago Regional Council's website at http://www.orc.govt.nz</u> <u>https://www.dairynz.co.nz/environment/effluent/effluent-storage/dairyeffluent-storage-calculator-desc/</u>	Support	Consistent industry standards and metrics.
Landpro Limited	80093.3 2	Part B: Glossary	Add definition for "ancillary structure"	Support	A definition will add clarity for plan users.
Ravensdown Ltd	80038.1 5	Part B: Glossary: Amended definition - Animal waste system	Amend as shown: includes Means the collection, conveyance, storage, <u>or</u> treatment, disposal or application of liquid or solid animal waste.	Support	Better clarifies the intent of the definition
Otago Regional Council	80042.1 5	Part B: New Definition	Add new definition: <u>Low-rate effluent application means a method of applying effluent or animal waste to land at a rate of no more than ten millimetres per hour.</u>	Oppose	While this definition may be suitable under some circumstances it will not suit all circumstances (e.g will vary dependant on soil types and slope). Some flexibility would be preferred.
Royal Forest and Bird Protection Society of New Zealand Inc	80082.0 6	Part B: Policy 7.D.7	Amend as follows: <u>7.D.7 Ensure the appropriate management and operation of animal waste systems by:</u> <u>(a) Requiring animal waste systems to be designed, constructed and located appropriately and in accordance with best practice; and</u>	Oppose	The use of "and/or" is ambiguous and confusing. Addition of Critical Source Area also goes beyond the intention of the Plan Change.

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p><u>(b) Ensuring that all animal waste systems:</u></p> <p><u>(i) Have sufficient storage capacity to avoid the need to dispose of effluent when soil moisture and/or weather conditions may result in run-off entering water and or the volume of the discharge exceeds the natural capacity of the soil to treat or remove the contaminant; and</u></p> <p><u>(ii) Include contingency measures to prevent discharges to water in the case of equipment or system failure; and</u></p> <p><u>(ii) Are operated in accordance with an operational management plan for the system that is based on best practice guidelines and inspected regularly; and</u></p> <p><u>(c) Avoiding the discharge of animal waste to water bodies, artificial watercourses, the coastal marine area, critical source areas and to saturated land; and</u></p> <p><u>(d) Requiring low-rate effluent application for any new discharge of animal waste to land and encouraging the transition to low-rate effluent application for existing discharges of animal waste to land.</u></p>		
Fonterra Co-operative Group Ltd	80091.03	Part B: Policy 7.D.7	<p>Amend Policy 7.D.7 to read:</p> <p><u>Ensure the appropriate management and operation of animal waste systems by:</u></p> <p><u>(a) Requiring animal waste systems to be designed, constructed and located appropriately and in accordance with best practice Good Management Practices (GMP), and any</u></p>	Support	"Good management practice" is industry preferred terminology. Appropriately includes reference to good management practices and industry standards

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p><u>necessary additional regionally appropriate standards; and</u></p> <p><u>(b) Ensuring that all animal waste systems:</u></p> <p><u>(i) Have sufficient storage capacity to avoid the need to dispose of effluent when soil moisture or weather conditions may result in run-off entering water; and</u></p> <p><u>(ii) Include contingency measures to prevent discharges to water in the case of equipment or system failure; and</u></p> <p><u>(ii)(iii) Are operated in accordance with an operational management plan for the system that is based on best practice Good Management Practice guidelines and industry standards and inspected regularly; and</u></p> <p><u>(c) Avoiding the discharge of animal waste to water bodies, artificial watercourses, the coastal marine area and to saturated land; and</u></p> <p><u>(d) Requiring low-rate effluent application for any new discharge of animal waste to land and encouraging the transition to low-rate effluent application for existing discharges of animal waste to land.</u></p>		
Otago Regional Council	80042.0 1	Part B: Policy 7.D.7(b)(ii)	<u>Amend as shown: Include contingency measures to prevent discharges of effluent to a water body, an artificial watercourse, or the coastal marine area, either directly or indirectly to water in the case of equipment or system failure;</u>	Oppose in part	Concerns with addition of artificial watercourses. Addition of 'directly or indirectly' for system failure or equipment failure may set unrealistic or unachievable standards
Otago Regional Council	80042.0 3	Part B: Policy 7.D.7(c)	Amend as shown: <u>Avoiding the discharge of animal waste to:</u>	Oppose	Soil moisture, saturated land and 'field capacity' require definition and clear industry standard guidelines.

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p><u>(i) water bodies, artificial watercourses, bores and soak holes, the coastal marine area; and</u></p> <p><u>(ii) saturated land in a manner that results in ponding or overland flow to water, including to frozen land; and (iii) land when the soil moisture exceeds field capacity; and</u></p>		
DairyNZ Limited	80088.03	Part B: Policy 7.D.7(d)	<p>Amend as follows:</p> <p><u>Requiring low-rate effluent application based on the soil risk framework for any new discharge of animal waste to land and encouraging the transition to low-rate using the soil risk framework for effluent application for existing discharges of animal waste to land.</u></p>	Support in part	Support industry metrics and independent standards like the 'soil risk framework'.
Landpro Limited	80093.05	Part B: Policy 7.D.7(d)	<p>Amend as follows:</p> <p><u>Where possible, ensuring Requiring low-rate effluent application for any new discharge of animal waste to land and encouraging the transition to low-rate effluent application for existing discharges of animal waste to land.</u></p>	Support in part	Aim is to encourage transition – the proposed amendment match the intention of the clause.
New Zealand Pork Industry Board	80015.05	Part B: Policy 7.D.8	Support a staged, risk-based approach to system upgrades. Amend rule framework and definitions for animal waste systems as described in the submission to account for an alternative standard for non-dairy operations.	Support	Appropriate to provide an alternative standard for non-dairy operations
Royal Forest and Bird Protection Society of New Zealand Inc	80082.08	Part B: Policy 7.D.8	Amend to require upgrading of existing waste systems to meet the standards of Rule 14.7.1.1. within 5 years of this plan change becoming operative.	Oppose	Changes required will be prohibitively expensive and largely unachievable for many, particularly during the current economic climate. Policies must be realistic and achievable.

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
DairyNZ Limited	80088.0 4	Part B: Policy 7.D.8(a)	Amend as follows: <u>Granting resource consents only where consent applications contain a timebound action plan for upgrading the existing animal waste system so that it meets the standards of Rule 14.7.1.1 or equivalent outcomes as soon as possible; and</u>	Support	A timebound Council agreed action plan could contain equivalent outcomes.
Ravensdown Ltd	80038.0 7	Part B: Rule 12.C.0.4	Amend as shown: <u>The discharge of animal waste from an animal waste system:</u> <u>(i) To any lake, river or Regionally Significant Wetland; or</u> <u>(ii) To any drain or water race that goes to a lake, river, Regionally Significant Wetland or coastal marine area; or</u> <u>(iii) To the bed of any lake, river or Regionally Significant Wetland; or</u> <u>(iv) To any bore or soak hole; or</u> <u>(v) To land within 50 metres of:</u> <u>(a) Any lake, river or Regionally Significant Wetland; or</u> <u>(b) Any bore or soak hole; or</u> <u>(vi) ...</u>	Support	For similar reasons to that proposed by the submitter
Otago Regional Council	80042.0 4	Part B: Rule 12.C.0.4	Amend as shown: <u>The discharge of animal waste from an animal waste system to:</u> <u>(i) To a Any lake, river or Regionally Significant Wetland; or</u>	Oppose in part	We support the deletion of (vii) but oppose the inclusion of (viii), which is technical and very dairy-focussed, This information won't be as easily ascertainable for non-dairy farmers. Concerns are adequately addressed via other provisions.

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p>(ii) To a<u>Any drain or water race that goes to a lake, river, Regionally Significant Wetland or coastal marine area; or</u></p> <p>(iii) To<u>The bed of any lake, river or Regionally Significant Wetland; or</u></p> <p>(iv) To a<u>Any bore or soak hole; or</u></p> <p>(v) To<u>Land within 50 metres of:</u></p> <p>(a) Any lake, river or Regionally Significant Wetland; or</p> <p>(b) Any bore or soak hole; or<u>(vi) To Land in a manner that results in ponding or overland flow to water, including to frozen land; or</u></p> <p>(viii) Land when the soil moisture exceeds field capacity</p> <p>(vii) That results in any of the following effects in receiving waters, after reasonable mixing:</p> <p>(a) the production of conspicuous oil or grease films, scums or foams, or floatable or suspended materials; or</p> <p>(b) any conspicuous change in the colour or visual clarity; or</p> <p>(c) any emission of objectionable odour; or</p> <p>(d) the rendering of fresh water unsuitable for consumption by farm animals; or</p> <p>(e) any significant adverse effects on aquatic life;</p> <p><u>is a prohibited activity.</u></p>		
Royal Forest and Bird	80082.09	Part B: Rule 12.C.0.4	<p>Amend as follows:</p> <p><u>The discharge of animal waste from an animal</u></p>	Oppose	Goes beyond the intention of the plan change; will capture too many

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Protection Society of New Zealand Inc			<p><u>waste system:</u></p> <p><u>(i) To any lake, river or Regionally Significant Wetland; or</u></p> <p><u>(ii) To any drain or water race that goes to a lake, river, Regionally Significant Wetland or coastal marine area; or</u></p> <p><u>(iii) To the bed of any lake, river or Regionally Significant Wetland natural wetland; or</u></p> <p><u>(iv) To any bore or soak hole; or</u></p> <p><u>(v) To land within 50 metres of:</u></p> <p><u>(a) Any lake, river or Regionally Significant Wetland natural wetland; or</u></p> <p><u>(b) Any bore or soak hole; or</u></p> <p><u>(vi) To land in a manner that results in ponding or overland flow to water, including to frozen land; or</u></p> <p><u>(vii) That results in any of the following effects in receiving waters, after reasonable mixing:</u></p> <p><u>(a) the production of conspicuous oil or grease films, scums or foams, or floatable or suspended materials; or</u></p> <p><u>(b) any conspicuous change in the colour or visual clarity; or</u></p> <p><u>(c) any emission of objectionable odour; or</u></p> <p><u>(d) the rendering of fresh water unsuitable for human consumption or by farm animals; or</u></p> <p><u>(e) any adverse effects on areas of significant indigenous vegetation and significant habitats; or</u></p> <p><u>(f) any significant adverse effects on aquatic life;</u></p> <p><u>is a prohibited activity</u></p>		areas with resulting restrictions on land (etc)

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Ravensdown Ltd	80038.08	Part B: Rule 12.C.1.4	Amend as shown: <u>Notwithstanding any other rule in this Plan, the discharge of animal waste, or water containing animal waste, from an animal waste system onto or into land is a permitted activity providing:</u> <u>(a) The animal waste system is permitted under Rules 14.7.1.1 and 14.7.1.2 or a resource consent has been granted under Rule 14.7.2.1;</u> <u>and</u> <u>(b) The discharge is not prohibited under Rule 12.C.0.4; and</u> <u>(c) The discharge does not occur within 50 20 metres of the boundary of the property on which the animal waste is generated, or beyond that boundary.</u>	Support	Provides better clarification on provisos. 20m is preferable as a setback for the reasons offered by the submitter
Otago Regional Council	80042.05	Part B: Rule 12.C.1.4	Add new clause (d): <u>(d) There is no discharge to frozen land or to land when the soil moisture exceeds field capacity.</u>	Oppose in part	Already covered by 12.C.0.4(vii) regarding frozen land, and field capacity requires improved definition
Landpro Limited	80093.11	Part B: Rule 12.C.1.4(c)	Amend to clarify that boundary setback is from boundary of neighbour (not boundary of each lot)	Support	Clarify boundary in terms of neighbour property.
Royal Forest and Bird Protection Society of New Zealand Inc	80082.11	Part B: Rule 12.C.2.5	Amend as follows: <u>12.C.2.5 The discharge of animal waste, or water containing animal waste, from an animal waste system onto or into land is a restricted discretionary activity provided:</u> <u>(a) The discharge is not prohibited under Rule 12.C.0.2A; and</u>	Oppose	Goes beyond intention of the plan change and will capture too many areas, with resulting restrictions on land beyond that intended or assessed within the S32 Report.

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p><u>(b) The discharge is not permitted under Rule 12.C.1.4;</u></p> <p><u>In considering any resource consent under this rule, the Otago Regional Council will restrict the exercise of its discretion to the following:</u></p> <p><u>(i) The application depth and rate;</u></p> <p><u>(ii) Size and location of the disposal area, including separation distances from lakes, rivers, Regionally Significant Wetlands, bores, soak holes, the coastal marine area water supply for human consumption and dwellings;</u></p> <p><u>(iii) Measures to avoid, remedy or mitigate adverse effects on water quality, taking into account the nature and sensitivity of the receiving environment;</u></p> <p><u>(iv) Measures to avoid, remedy or mitigate adverse effects on Kāi Tahu cultural and spiritual beliefs, values and uses;</u></p> <p><u>(v) Measures to prevent adverse effects on human contact recreation and food sources;</u></p> <p><u>(vi) Duration of consent and any review conditions;</u></p> <p><u>(vii) Quality of, and compliance with, a management plan for the animal waste system;</u></p> <p><u>and</u></p> <p><u>(viii) Any information and monitoring requirements.</u></p>		

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Fonterra Co-operative Group Ltd	80091.08	Part B: Rule 12.C.2.5	<p>Amend Rule 12.C.2.5 as follows: <u>The discharge of animal waste, or water containing animal waste, from an animal waste system onto or into land is a restricted discretionary-controlled activity provided that:</u> <u>(a) The discharge is not prohibited under Rule 12.C.0.2A; and</u> <u>(b) The discharge is not permitted under Rule 12.C.1.4;</u></p> <p><u>And is subject to the following conditions:</u> <u>1. The waste system (including collection, transfer networks, ancillary structures and contingency systems) is designed and operated in a manner consistent with the descriptions and standards set out in the Farm Dairy Effluent Design Standards and Code of Practice (COP) and</u> <u>2. The storage pond(s) or tank(s) is sized in accordance with the Dairy Effluent Storage Calculator; (90% DESC as carried out and certified by an approved person within two years of consent being granted) or an equivalent storage outcome as approved by the Council) and</u> <u>3. The storage pond / tank fully complies with (i), (ii), (iii) or (iv) below within 2 years of resource consent being granted (or an equivalent sealing outcome as approved by the Council):</u> <u>(i) Fully lined with an impermeable liner and has an effective leak detection system that underlies the storage pond; or</u></p>	Support	Appropriate reflection of dairy industry standards and guidelines

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p><u>(ii) Of clay construction and certified as being engineered and sealed so as to meet the pond design standards in the effluent COP; or</u> <u>(iii) Of concrete construction (with design specifications consistent with permeability standard); or</u> <u>(iv) Is an above-ground tank (with design specifications consistent with permeability standard); and</u> <u>4. A management plan for the animal waste system is prepared and implemented that requires:</u> <u>(i) An effluent irrigation management plan in Council approved format including a training record for all staff involved in effluent management, recording of irrigation events and an incident register.</u> <u>(ii) Leak detection system checks (where relevant) carried out monthly and a written record of inspections to be kept.</u> <u>(iii) If a leak is detected by the leak detection system, an assessment is undertaken by a Suitably Qualified Person within two months of the detection to determine whether the leak is within the normal operating parameters of the pond.</u> <u>(iv) Pond drop tests, or an alternative approved permeability assessment of the storage pond(s) (does not apply to an engineered above ground storage tank, or to ancillary system structures</u></p>		

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p><u>such as sumps and transfer tanks that have been certified as fit for purpose) every three years; and</u> <u>(v) Contingency measures to prevent unauthorised discharges in the event of power outage or the failure of equipment. Otago Regional Council reserves control over the following matters:</u> <u>(a) The design and construction of the system, including storage capacity; and</u> <u>(b) The design, construction and adequacy of ancillary structures that are components of the animal waste system; and</u> <u>(c) Methods to protect the system from damage by flooding, animals and machinery; and</u> <u>(d) Quality of, and implementation of, a management plan for the animal waste system; and</u> <u>(e) Potential adverse effects of construction, maintenance and use on water bodies, drains, groundwater, bores, drinking water supplies, the coastal marine area, stop banks, dwellings, places of assembly and urban areas; and</u> <u>(f) Location of the animal waste system; and</u> <u>(g) Measures to avoid, remedy or mitigate adverse effects on Kāi Tahu cultural and spiritual beliefs, values and uses.</u> <u>(h) Any information and monitoring requirements.</u></p> <p><u>In considering any resource consent under this rule, the Otago Regional Council will restrict the</u></p>		

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p>exercise of its discretion to the following:</p> <p>(i) The application depth and rate;</p> <p>(ii) Size and location of the disposal area, including separation distances from lakes, rivers, Regionally Significant Wetlands, bores, soak holes, water supply for human consumption and dwellings;</p> <p>(iii) Measures to avoid, remedy or mitigate adverse effects on water quality, taking into account the nature and sensitivity of the receiving environment;</p> <p>(iv) Measures to avoid, remedy or mitigate adverse effects on Kāi Tahu cultural and spiritual beliefs, values and uses;</p> <p>(v) Duration of consent and any review conditions;</p> <p>(vi) Quality of, and compliance with, a management plan for the animal waste system;</p> <p>and</p> <p>(vii) Any information and monitoring requirements.</p>		
DairyNZ Limited	80088.0 6	Part B: Rule 12.C.2.5(i)	Amend as follows: <u>The application depth and rate based on the soil risk framework;</u>	Support	For the reasons offered by the submitter. Industry consistency in standards.
DairyNZ Limited	80088.0 1	Part B: Rule 14.7	Amend to clarify that solids storage areas are not considered to be a storage pond; or change term to "effluent pond"	Support	Provides appropriate clarity on terminology

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Landpro Limited	80093.2 1	Part B: Rule 14.7.1.1(c)(i)	Amend as follows: <u>Pond drop tests of the storage pond(s) every three five years;</u>	Support in part	More workable and still appropriate as proposed.
DairyNZ Limited	80088.1 0	Part B: Rule 14.7.2.1	Amend council control clauses as follows: <u>(e) Quality of, and implementation of, a management plan for the animal waste system including the information in provided template which requires pond drop tests of the system's storage pond(s) every three years;</u> Insert the following as a method other than rules: <u>The Otago Regional Council will develop a template and guidance for the content of an animal effluent management plan in consultation with relevant primary industry groups or adopt existing industry plans such as the DairyNZ template.</u>	Support	Appropriate adoption of industry guidelines
Landpro Limited	80093.2 2	Part B: Rule 14.7.2.1(c)	Amend reference to Practice Note 27 for in ground pond systems (as Practice Note 27 does not apply to in ground pond systems)	Support	Provides greater technical accuracy
DairyNZ Limited	80088.0 8	Part B: Rule 14.7.2.1(d)(iii)	Delete clause <u>(iii) Within 50 metres of any bore or soak hole;</u>	Support	For similar reasons to that provided by the submitter
NZ Pork Industry Board	80015.1 2	Part B: Rule 14.7.3.1	Replace definition for Animal Waste System with new definition for Effluent Ponds and Create a permitted activity pathway for non-dairy effluent ponds.	Support in Part	Support in part for a permitted pathway for non-dairy effluent ponds

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
NZ Pork Industry Board	80015.1 4	Part B: Schedule 19	Include relevant calculations for sizing piggery effluent ponds. Extend timeframes for lodgement of resource consent applications for effluent ponds with 0-10 days of storage.	Support	Appropriate and reasonable for plan users.
DairyNZ Limited	80088.1 3	Part B: Schedule 19A	Replace storage calculation (step 1: daily waste volume) with the following: <u>Daily waste volume m3 = Maximum cow numbers x 70l/cow</u> <u>Or</u> <u>Daily waste volume (m3) = Maximum cow numbers x water use per milking x number of milking per day</u>	Support	Aligns with industry standards
Balance Agri-Nutrients Ltd	80068.0 7	Part C: Definition: Feed Pad	Reinstate the definition and amend to align with the NES-FW definition.	Support	Aligns with NES-FW definitions.
Ravensdown Ltd	80038.2 1	Part C: Definition: Intensive grazing	Amend as shown: Means grazing of stock on forage crops (including brassica, beet and root vegetable crops), excluding pasture and cereal crops. <u>Means grazing livestock on an annual forage crop at any time in the period that begins on 1 May and ends with the close of 30 September of the same year.</u>	Support	More consistent with National Environmental Standard definitions
Balance Agri-Nutrients Ltd	80068.0 8	Definition: sacrifice paddock	Reinstate the definition and amend to align with the NES-FW definition.	Support	Aligns with NES Freshwater definitions

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Balance Agri-Nutrients Ltd	80068.09	Part C: Definition: stand-off pad	Reinstate the definition and amend to align with the NES-FW definition.	Support in part	Aligns with NES Freshwater definitions
Central Otago Environment Society	80028.03	Part C: Policy 7.D.9	Require the changes in the policy rather than just promoting them. Stock must be excluded from critical source areas and good farming practices mandated.	Oppose	'Promotion' gets people on board and on the right path.
Central Otago Environment Society	80028.04	Part C: Policy 7.D.9	Mandate setbacks from waterways in critical sources areas relative to the gradient of the land and the intensity of grazing to manage sedimentation from agricultural operations.	Oppose	Too technical and would not work in practice
Otago Fish and Game Council and the Central South Island Fish and Game Council	80080.15	Part C: Policy 7.D.9	Amend as follows: <u>7.D.9 Enable farming activities while reducing their adverse environmental effects by:</u> <u>(a) Promoting the implementation of good management practices (or better) to reduce sediment and contaminant loss to water bodies; and</u> <u>(b) Managing stock access to water bodies to:</u> <u>(i) Progressively exclude stock from lakes, wetlands, and continually flowing rivers; and</u> <u>(ii) Avoid significant adverse effects on water quality, bed and bank integrity and stability, Kai Tahu values, and river and riparian ecosystems and habitats; and</u> <u>(c) Setting minimum standards for intensive grazing; and</u> <u>(d) Managing the risk of sediment run off from farming activities by:</u>	Oppose	Goes considerably beyond both the intention of the provision, the National Environmental Standards for Freshwater and the Resource Management (Stock Exclusion) regulations.

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p><u>(i) Using remote sensing technologies to map slope where agricultural activities occur within Otago and making the mapping available to the public; and</u> <u>(ii) Implementing setbacks from water bodies, drains, and critical source areas, and establishing riparian margins; and</u> <u>(iii) Limiting areas and duration of exposed soil; and</u> <u>(iv) Requiring the consideration of slope in adjoining land when implementing setbacks from water bodies and critical source areas.</u> <u>(e) Promoting the identification and management of critical source areas within individual properties, to reduce the risk of nutrient or microbial contamination and sediment run-off, including by:</u> <u>(i) Using remote sensing technologies to map critical source areas where agricultural activities occur within Otago and making the mapping available to the public; and</u> <u>(ii) retaining critical source areas in a grassed state; and</u> <u>(iii) avoiding intensive grazing in critical source areas and wetlands.</u></p>		
Balance Agri-Nutrients Ltd	80068.02	Part C: Policy 7.D.9(c)	Amend as shown: <u>(c) Setting minimum standards for intensive winter grazing; and</u>	Support	Better aligns with the intention and wording of the NES Freshwater

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Aukaha Limited	80059.20	Part C: Policy 7.D.9(d)	Amend as shown: 9(d) to read: <u>(d) Managing the risk of sediment run off from farming activities by: (i) Implementing setbacks from water bodies and establishing riparian margins vegetation, and ...</u>	Oppose	Goes beyond the current Resource Management (Stock Exclusion) Regulations. Planting vegetation should be actively encouraged and supported through other non-regulatory mechanisms
Otago Regional Council	80042.20	Part D: Definition: Intensive grazing	Delete Definition of Intensive Grazing: <u>Intensive grazing Means grazing of stock on forage crops (including brassica, beet and root vegetable crops), excluding pasture and cereal crops.</u>	Support	Ensures greater alignment with the National Environmental Standard for Freshwater
Otago and the Central South Island Fish and Game Council	80080.14	Part D: Glossary	Amend definition of "Intensive Graving" as follows: <u>Means grazing of stock on forage crops (including brassica, beet and root vegetable crops), excluding pasture and cereal crops or grazing of pasture and cereal crops in a manner that results in pugging.</u>	Oppose	Relief sought is inconsistent with both the Parliamentary intent and the wording of the National Environmental Standard for Freshwater
Royal Forest and Bird Protection Society of New Zealand Inc	80082.17	Part D: Glossary	Amend definition of "Intensive grazing" as follows: <u>Means grazing of stock on forage crops (including brassica, beet and root vegetable crops), excluding or pasture and cereal crops in a manner that results in bare ground or reduces sward thickness below 10cm.</u>	Oppose	Relief sought is inconsistent with both the Parliamentary intent and the wording of the National Environmental Standard for Freshwater
Pomahaka Water Care Group	80102.07	Part D: Rule 14.6	Align intensive grazing rules with the new National Environmental Standards for Freshwater	Support	Ensures consistency with the National Environmental Standards for Freshwater

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Otago Fish and Game Council and the Central South Island Fish and Game Council	80080.16	Part D: Rule 14.6.1.1	Amend as follows: ... <u>(b) There is no intensive grazing in any critical source area or wetland area; and</u> ... <u>(d) A vegetated strip of at least 10 metres is maintained between the intensively grazed area and any water body, drain or critical source area, and all stock are excluded from this strip during intensive grazing.</u>	Oppose	Relief sought is inconsistent with both the Parliamentary intent and the wording of the National Environmental Standard for Freshwater
Royal Forest and Bird Protection Society of New Zealand Inc	80082.20	Part D: Rule 14.6.1.1	Amend as follows: <u>14.6.1.1 The use of land for intensive grazing is a permitted activity providing:</u> <u>(a) The total cumulative area of the landholding used for intensive grazing is the lesser of:</u> <u>(i) 400-50 hectares; or</u> <u>(ii) 10%-15% of the total cumulative area of the landholding.</u> <u>(b) There is no intensive grazing in any critical source area or natural wetland; and</u> <u>(c) Stock are progressively grazed (break-fed or block-fed) from the top of a slope to the bottom of a slope; and</u> <u>(d) A vegetated strip of at least 10-20metres is maintained between the intensively grazed area and any water body, drain or critical source area and all stock are excluded from this strip during intensive grazing.</u>	Oppose	Relief sought is inconsistent with both the Parliamentary intent and the wording of the National Environmental Standard for Freshwater

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Ravensdown Ltd	80038.2 0	Part D: Rule 14.6.2.1	Amend as shown: <u>Except as provided by Rule 14.6.1.1, the use of land for intensive winter grazing is a restricted discretionary activity. In considering any resource consent under this rule, the Otago Regional Council will restrict the exercise of its discretion to the following:</u> <u>(i) The extent of intensive winter grazing and the stock being grazed;</u> <u>(ii) Separation distances from lakes, rivers, Regionally Significant Wetlands, bores, soak holes, water supply for human consumption and dwellings;</u> <u>(iii) Measures to avoid, remedy or mitigate adverse effects on water quality, taking into account the nature and sensitivity of the receiving environment;</u> <u>(iv) Measures to avoid, remedy or mitigate adverse effects on Kāi Tahu cultural and spiritual beliefs, values and uses;</u> <u>(v) Duration of consent and any review conditions; and</u> <u>(vi) Any information and monitoring requirements.</u>	Support	Pragmatic and provides for appropriate matters of discretion.
Otago and the Central South Island Fish and Game Council	80080.1 7	Part E	Amend Chapter 13 title as follows: Rules: Land Use on Lake or River Beds or Regionally Significant Wetlands <u>and other wetlands</u>	Oppose	This raises changes beyond the scope of the Plan Change and impacts other provisions not up for consideration. Risks being inconsistent with previous Plan Change decisions, and national regulations.

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Royal Forest and Bird Protection Society of New Zealand Inc	80082.2 2	Part E	Amend chapter 13 title as follows: "Land Use on Lake or River Beds or Regionally Significant Wetland <u>and other Natural Wetlands.</u> "	Oppose	This raises changes beyond the scope of the Plan Change and impacts other provisions not up for consideration. Risks being inconsistent with previous Plan Change decisions, and national regulations.
DairyNZ Limited	80088.2 3	Part E: Glossary	Replace definition of "Dairy cattle" with the following: <u>Dairy cattle:</u> <u>(a) means cattle that are farmed for producing milk; and</u> <u>(b) includes—</u> <u>(i) any bull on the farm whose purpose is mating with those cattle; and</u> <u>(ii) unweaned calves of those cattle; but</u> <u>(c) does not include dairy support cattle</u>	Support	Aligns with Resource Management (Stock Exclusion) Regulations 2020 definitions of "Dairy Cattle"
DairyNZ Limited	80088.2 4	Part E: Glossary	Add definition of "Dairy support cattle" as follows: <u>Dairy support cattle means cattle that—</u> <u>(a) are farmed for producing milk but are not being milked (for example, because they are heifers or have been dried off); and</u> <u>(b) are grazed on land that is not grazed by dairy cattle</u>	Support	Aligns with Resource Management (Stock Exclusion) Regulations 2020 definitions of "Dairy Cattle"
Fonterra Co-operative Group Ltd	80091.1 7	Part E: Glossary	Include definition of Beef Cattle	Support	Support inclusion of definition of "beef cattle" from Resource management (Stock Exclusion) Regulations 2020

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Otago and the Central South Island Fish & Game	80080.1 8	Part E: Rule 13.5	Amend Rule 13.5 heading as follows: 13.5 Alteration of the bed of a lake or river, or of a Regionally Significant Wetland <u>or wetland</u>	Oppose	Beyond scope of this plan change and impacts matters not up for consideration or submissions.
Forest and Bird Protection Society	80082.2 3	Part E: Rule 13.5	Amend as follows: 13.5 Alteration of the bed of a lake or river, or of a Regionally Significant Wetland <u>and natural wetlands</u>	Oppose	Beyond scope of this plan change and impacts matters not up for consideration or submissions.
Otago and the Central South Island Fish & Game	80080.0 7	Part E: Rule 13.5.1	Replace all instances of "Regionally Significant Wetland" with wetland	Oppose	Beyond scope of this plan change and impacts matters not up for consideration or submissions.
Otago Fish and Game Council and the Central South Island Fish and Game Council	80080.1 9	Part E: Rule 13.5.1.8A	Amend as follows: 13.5.1.8A The disturbance of the bed of any lake or river, or any <u>wetland or Regionally Significant Wetland</u> by <u>(b) From 2022:</u> <u>(i) All dairy cattle and pigs stock are excluded from the beds of wetlands, lakes, continually flowing rivers wider than 1 metre and Regionally Significant Wetlands; and</u> <u>(ii) where stock are excluded under (i), a setback of five metres from the beds of wetlands, lakes, continually flowing rivers wider than 1 metre and Regionally Significant Wetlands is implemented.</u>	Oppose	Needs to be consistent with NPS Freshwater management

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Otago and the Central South Island Fish and Game Council	80080.20	Part E: Rule 13.5.1.8A	Amend Note 1 as follows: <u>For the purposes of Rule 13.5.1.8A(b), a continually flowing river is considered to be wider than 1 metre if the river is wider than 1 metre at any point within a land parcel the boundary of a landholding at its annual fullest flow without overtopping its banks.</u>	Oppose	Needs to be consistent with NPS Freshwater management
Royal Forest and Bird Protection Society of New Zealand Inc	80082.25	Part E: Rule 13.5.1.8A	Amend Note 2 as follows: <u>(2) For the purposes of Rule 13.5.1.8A(b)(ii), setbacks are measured from the edge of the wetted bed of a lake or river wider than 1 metre or Regionally Significant Wetland natural wetland and are averaged across the landholding.</u>	Oppose	Relief sought is inconsistent with both the Parliamentary intent and the wording of the Essential Freshwater regulations, in particular the Resource Management (Stock Exclusion) Regulations 2020 and the National Environmental Standard for Freshwater
Otago Regional Council	80042.17	Part E: Rule 13.5.1.8A(b)	Delete Rule 13.5.1.8A(b). Replace with advice note in Section 13.5. Amend as shown: (b) From 2022: <u>(i) All dairy cattle and pigs are excluded from the beds of lakes, continually flowing rivers wider than 1 metre and Regionally Significant Wetlands; and (ii) where stock are excluded under (i), a setback of five metres from the beds of lakes, continually flowing rivers wider than 1 metre and Regionally Significant Wetlands is implemented. Advice Note: For regulations on stock exclusion from waterways refer to the Resource Management (Stock Exclusion) Regulations 2020.</u>	Support	Support alignment with the Resource Management (Stock Exclusion) Regulations 2020

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Director General of Conservation	80055.23	Part E: Rule 13.5.1.8A(b)	Retain with the following changes: 13.5.1.8A The disturbance of the bed of any lake or river, or any Regionally Significant natural Wetland by livestock, ... (b) From 2022: <u>(i) All dairy cattle and pigs All cattle, deer and pigs are excluded from the beds of lakes, continually flowing rivers wider than 1 metre and Regionally Significant natural Wetlands; and</u> <u>(ii) where stock are excluded under (i), a setback of five ten metres from the beds of lakes, continually flowing rivers wider than 1 metre and Regionally Significant natural Wetlands is implemented.</u>	Oppose	Relief sought is inconsistent with both the Parliamentary intent and the wording of the Essential Freshwater regulations, in particular the Resource Management (Stock Exclusion) Regulations 2020 and the National Environmental Standard for Freshwater
Royal Forest and Bird Protection Society of New Zealand Inc	80082.24	Part E: Rule 13.5.1.8A(b)	Amend as follows: <u>(b) From 2022:</u> <u>(i) All dairy cattle and pigs are excluded from the beds of lakes, continually flowing rivers wider than 1 metre and Regionally Significant Wetlands and natural wetlands; and</u> <u>(ii) where stock are excluded under (i), a setback of five ten metres from the beds of lakes, continually flowing rivers wider than 1 metre and Regionally Significant Wetlands and natural wetlands is implemented.</u>	Oppose	Relief sought is inconsistent with both the Parliamentary intent and the wording of the Essential Freshwater regulations, in particular the Resource Management (Stock Exclusion) Regulations 2020 and the National Environmental Standard for Freshwater
DairyNZ Limited	80088.21	Part E: Rule 13.5.1.8A(b)	Add condition (iii) as follows: <u>Existing permanent fences at the date of plan notification do not need to be moved until the replacement date.</u>	Support	Ensures consistency with the Resource Management (Stock Exclusion) Regulations 2020

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
Maori Point Vineyard Ltd (Arthur)	80004.06	Part E: Rule 13.5.1.8A(b)(i)	Amend by replacing 'All dairy cattle and pigs...' with 'All grazing and foraging domestic animals...': (b)(i) <u>All dairy cattle and pigs grazing and foraging domestic animals are excluded from the beds of lakes...</u>	Oppose	Needs to be consistent with NPS Freshwater and Resource Management Stock exclusion regulations
Director General of Conservation	80055.24	Part F: Rule 13.5.1.10	Retain with the following changes: 13.5.1.10(i) There is no damage to fauna or New Zealand native flora in or on any Regionally Significant <u>natural</u> Wetland.	Oppose	Could lead to perverse outcomes and prevent the establishment of much needed sediment traps if provision was extended to all natural wetlands (rather than those meeting significant criteria)
Otago and the Central South Island Fish and Game Council	80080.22	Part G: Policy 7.D.10	Amend as follows: <u>The loss or discharge of sediment from earthworks and associated cumulative effects, is avoided or, where avoidance is not achievable, best practice guidelines for minimising sediment loss are implemented.</u>	Oppose	Extends beyond the intention of plan.
Horticulture New Zealand	80016.10	Part G: Rule 14.5.1.1	Provide greater clarity in the administration of Rule 14.5.1.1 and Rule 14.5.2.1 by either replicating all of clause (g) in Rule 14.5.2.1 or by removing it from Rule 14.5.1.1 and moving it to Rule 14.5.2.1. If Clause (g) is retained in Rule 14.5.1.1, insert new criterion as follows: <u>14.5.1.1 (g) The discharge of sediment does not result in any of the following effects in receiving waters, after reasonable mixing: ... (v) any significant adverse effects on aquatic life.; or (vi)</u>	Support in part	Agree with the inclusion of (g) as it adds clarity

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<u>the rendering of fresh water unsuitable for the irrigation and processing of food crops.</u>		
Otago and the Central South Island Fish and Game Council	80080.2 4	Part G: Rule 14.5.1.1	Amend as follows: <u>14.5.1.1 The use of land, and the associated discharge of sediment into water or onto or into land where it may enter water, for earthworks for residential development earthworks is a permitted activity providing:</u>	Oppose	Relief sought makes the provision unclear. The rule is specific for residential development
Beef + Lamb New Zealand	80084.0 2	Plan change 8	Amend by adding the following principles for the allocation of nutrients: Principle 1 Like land should be treated the same: Allocation should be based on the intrinsic qualities of the land. Two pieces of land with the same qualities should receive the same allocation. This principle recognises that allocation regimes should not be overly influenced by existing land use. Principle 2 Those undertaking activities that have caused water quality problems should be required to improve their management to meet water quality limits: All New Zealanders have a responsibility to manage their activities to maintain or improve water quality. This principle reflects the need for those who have caused water quality problems or who are contributing a greater amount to them to	Oppose	We oppose such insertion at this time. While we agree with the contents of many of these principles, we consider their insertion into the plan via this plan change is beyond its scope. This is a matter for thorough discussion, submissions and evidence during the full review of the Otago Water Plan

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p>take a greater responsibility for meeting the costs of reducing nutrient loss to water. It also reinforces that those who have managed responsibly should not be required to have their land use constrained as a result of others' activity.</p> <p>Principle 3 Flexibility of land use must be maintained: Land owners need to have the ability to respond to changes in climate, input costs, markets and technological innovation in order to maintain a profitable and sustainable farming enterprise. Allocating nutrients in such a way that unnecessarily limits land use change constrains the ability of land users to respond to those changes and optimally utilise the land resource.</p> <p>Principle 4 The allocation system should be technically feasible, simple to operate and understandable: A high level of technical feasibility is fundamental to a successful allocation approach. The simpler the system, the more likely it is to be able to operate effectively. The approach must also be understandable by land users and the wider community. It must be able to be administered fairly and at minimum transaction costs to users and the regulator.</p> <p>Principle 5 The natural capital of soils should be the primary consideration when establishing an allocation mechanism for</p>		

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p>nutrient loss: A natural capital approach allows for an economically efficient allocation of nutrients. Those soils with the greatest ability to retain nutrients and optimise nutrient use give land users the greatest flexibility to optimise production, respond to markets and technology while managing potential effects on water quality. Allocation systems should reflect the ability of these soil types to optimise production and land use flexibility.</p> <p>Principle 6 Allocation approaches should provide for adaptive management and new information: Allocation decisions are primarily made on the information we know now and modelled future scenarios. Our understanding and the availability of both catchment and farm systems will change over the life of an allocation system as will possible management techniques. Allocation systems should provide sufficient flexibility to provide for adaptive management and be reviewed regularly to incorporate new information. Adequate transition times should be provided to incorporate new information where allocation changes as a result.</p> <p>Principle 7 Appropriate timeframes must be set to allow for transition from current state to</p>		

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p>one where allocation of nutrients applies: Timeframes should take account of the degree to which any waterway is over-allocated (if that is the case), the period over which this state has come about and the costs for businesses and the current ability to manage to that allocation. It should be recognised that current water quality issues are sometimes the result of many years of land use within catchments and may have developed over generations. Consideration needs to be taken of the legitimate expectations of people and natural justice. Accordingly time should be provided for them to adjust. There needs to be a balanced approach and recognition of the uncertainty associated with water science versus the likely economic impact on businesses and the region. The primary objective should be to set an appropriate direction of travel that will see a steady improvement in water quality.</p> <p>Principle 8 Long term investment certainty is a critical feature of a viable nutrient management system: Changes to nutrient allocation regimes must be signalled as far out as possible. Refinements to those systems must be managed to minimise their impacts on business viability, land value and the flexibility of land use. The aim must be to reflect the underlying elements of sustainable management in achieving improved water quality</p>		

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p>outcomes including reducing those adverse impacts on social and economic outcomes.</p> <p>Principle 9 Improvement in water quality must remain the primary objective of adopting any nutrient allocation regime: When exploring the adoption of methods to achieve water quality improvements and manage to limits, the focus of community debates, modelling and discussion of allocation of nutrients can distract from the primary goal – maintaining and improving water quality. This principle emphasises that allocating nutrients to a property level doesn't in itself result in improved in water quality; it is the actions of land users that ultimately result in improved nutrient management.</p> <p>Principle 10 In under-allocated catchments, where property based nutrient allocation has not been adopted in setting water quality limits, the system for allocating nutrients must be determined well before the limit is reached, be clear and easy to understand, and designed to avoid over-allocation: The mechanism for allocating nutrients, even if it does not have immediate effect, should be clear from the time when water quality limits are set. Allocation mechanisms should reflect the level of risk that the catchment will become over</p>		

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p>allocated. This may include the adoption of a pre-agreed catchment-specific environmental threshold (e.g. 75%-90% of a limit) to determine when an allocation regime should be adopted.</p> <p>Principle 11 In designing the allocation system the benefits of a nutrient transfer system within the catchment or water management unit should be considered: Maximum economic efficiency of land use could be assisted by a mechanism for transferring nutrient discharge allowances within the same catchment. Nutrient transfer systems are only appropriate where:</p> <ul style="list-style-type: none"> (i) the initial allocation system meets all of the allocation principles; (ii) only occurs within a sub-catchment or watershed and enables and supports Catchment Collective Groups; (iii) the transferable portion of the resource (e.g. nitrogen) only pertains to the load which achieves the desired environmental outcome; (iv) be a transfer within an established sub catchment programme that's based on allocation of a load consistent with these principles; and (v) results in improved economic outcomes and land use optimisation. <p>Principle 12 Regulation, monitoring, auditing and reporting of nutrients within an allocation</p>		

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p>regime needs to relate to the degree of environmental impact and pressure: If there is limited environmental pressure and if an activity has a low impact then regulation – and the financial cost of complying with that regulation – should be commensurate with the degree to which the activities are causing an adverse effect on water quality.</p> <p>Principle 13 As a minimum expectation, in all catchments, all land users should be at or moving towards (industry defined) Good Management Practice (GMP), recognising that GMP is constantly evolving and continuous improvement is inherent in GMP: In many catchments, lifting everyone to GMP is likely to go a long way towards achieving community objectives for managing to water quality limits. In catchments where nutrients are not over allocated, requiring good management practice is a sound alternative method to allocating nutrients to a farm (property based) level.</p> <p>Principle 14 Nutrient allocation must be informed by sound science and stable and reliable catchment and farm system modelling and measurement: Modelling nutrient loss is important to inform nutrient allocation, but all models have limitations.</p>		

Submitter Name	Sub No.	Section of Plan	Decision requested	Support/ Oppose	Reason for submission
			<p>Overseer is a key tool for understanding and managing nutrients on farms and to inform nutrient allocation decisions. In the short term there are significant limitations that need to be catered for in determining any regulatory or nutrient allocation regime (e.g. assumptions in Overseer regarding GMP, modelling of cropping regimes, ability of Overseer to estimate nutrient loss from the adoption of certain mitigations and the validation of Overseer estimates). Other measures may need to be included in the approach to managing nutrient loss to ensure innovative change is incentivised and that the focus remains on promoting good practice. Over time modelling designed to estimate nutrient loss will improve. Modelled estimates will change, so allocation regimes should account for modelling uncertainty and provide for appropriate transition periods.</p>		