



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Further submission by

Auckland Waikato Fish and Game

and

Eastern Region Fish and Game

on the

Proposed Waikato Regional Plan Change 1 and Variation 1 to Proposed Plan Change 1 to the Waikato Regional Plan (Healthy Rivers/Wai Ora)

Auckland/Waikato Region
156 Brymer Rd, RD 9, Hamilton 3289, New Zealand. Telephone (07) 849 1666 Facsimile (07) 849 1648
Email: admin@awfg.org.nz www.fishandgame.org.nz



Statutory managers of freshwater sports fish, gamebirds and their habitats.

*Form 6 - Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation
Cl 8, Schedule 1 Resource Management Act 1991*

To: Science and Strategy – Policy
Waikato Regional Council
Private Bag 3038
Waikato Mail Centre
Hamilton 3240

Submitter: Auckland Waikato Fish and Game and Eastern Region Fish and Game (Fish and Game)

This is a further submission in support of or opposition to a submission on the following change(s) proposed to the Waikato Regional Plan (the **Proposal**):
Healthy Rivers Plan Change 1 and Variation 1 to Plan Change 1

I am:

- A person representing a relevant part of the public interest; and
- A person who has an interest in the proposal that is greater than the interest the general public has.



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Fish and Game's Interest in the Proposal

Fish and Game Councils are statutory bodies with statutory functions under s 26Q of the Conservation Act 1987 to:

1. Manage, maintain and enhance the sports fish and game resource in the recreational interests of anglers and hunters (26Q(1));
2. Assess and monitor the condition and trend of ecosystems as habitats for sports fish and game 26Q(1)(a)(iii);
3. To maintain and improve the sports fish and game resource by:
 - a. maintaining and improving access 26Q(1)(b)(ii);
 - b. ensuring there are sufficient resources to enforce fishing and hunting season conditions 26Q(1)(b)(iv);
 - c. undertaking such works as may be necessary to maintain and enhance the habitat of sports fish and game, subject to the approval of the Minister, the land owner, or the administering authority, as the case may require 26Q(1)(b)(v):
4. In relation to planning:
 - a. to represent the interests and aspirations of anglers and hunters in the statutory planning process (26Q(1)(e)(i));
 - b. to prepare sports fish and game management plans in accordance with this Act (26Q(1)(e)(iii)); and
 - c. to advocate the interests of the Council, including its interests in habitats 26Q(1)(e)(vii).

Fish and Game has a defined responsibility relating to managing certain aspects of the natural environment. Fish and Game Councils are Schedule 4 Crown Organisations under the Public Finance Act 1989 with specific functions, responsibilities and powers to manage sports fish and game birds, regionally and nationally. Section 26Q, 26R and 26S of the Conservation Act 1987 set these out in detail.

While Fish and Game has functions relating to species management, it has no statutory functions in relation to habitat management and can only advocate for habitat outcomes. As such, the decisions of other agencies, including Council, directly impact on the ability of Fish and game to fulfil its statutory functions. Section 7(h) of the Resource Management Act (RMA) provides that all persons exercising powers and functions under that Act *shall have particular regard to ... the protection of the habitat of trout and salmon.*



Statutory managers of freshwater sports fish, gamebirds and their habitats.

I support or oppose the following submissions: contained in the following pages (pp 5-99).

The particular parts of the submission I support or oppose are: contained in the following pages (pp 5-99).

The reasons for my support for my support or opposition are: contained in the following pages (pp 5-99).

I seek that the whole or part of the submission be allowed or disallowed: as set out in the following pages (pp 5-99).

Hearing: I wish to be heard in support of my submission and will consider presenting a joint case at any hearing with other parties presenting on similar matters.

Signed by:

A handwritten signature in blue ink, appearing to read 'Ben Wilson'.

Ben Wilson
Chief Executive
Auckland Waikato Fish and Game

Date: 17 September 2018

Address for service: C/o Ben Bilson
Auckland Waikato Fish and Game
156 Brymer Road
RD 9
Hamilton 3289
07 849 1666

bwilson@fishandgame.org.nz



Statutory managers of freshwater sports fish, gamebirds and their habitats.

FURTHER SUBMISSION POINTS TO PLAN CHANGE 1

By Submitter

Alcock, Carl and Jo *Submitter ID: 73376*

Address of Original Submitter: altonhenry@farmside.co.nz, 81 Pukerimu Road, R D 3, Te kuiti

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Policy 6	PC1-2101	Support in part with amendment	The submitter seeks amendments to the rule which more appropriately manage cumulative effects, however the exceptions should relate to the risks of environmental effects rather than purely the size of the operation to promote sustainable management.	DISALLOW amendment which would enable this to occur for land users based solely on the size of the operation (less 40ha). Otherwise ALLOW amendments sought.

Awaroa Lands Ltd *Submitter ID: 73627*

Address of Original Submitter: OCSaxton@xtra.co.nz Oliver C Saxton, 377 Tiko Tiko Road, RD2, Huntly 3772

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
General	PC1-6629	Oppose	The submitter seeks to address koi carp before anything else. The approach overly focusses on one factor related to the degraded state in some specific areas of the Waikato catchment and does not address the overall issue of overallocation which PC1 sets out to address. The amendment does not promote sustainable management. The management of specific pest species is already housed appropriately within Method 3.11.4.4.	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Beef and Lamb New Zealand Submitter ID: 73369

Address of Original Submitter: corina.jordan@beeflambnz.com, PO Box 135, Fielding 4740

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
General	PC1-11511	Support	PPC1 must encapsulate the catchment from Taupō gates in its entirety to give effect to the Vision and Strategy. The a s32 analysis on alternative methods is necessary due to limitations to the existing s32 Report.	ALLOW
General	PC1-13160	Support in part and oppose in part	<p>Fish and Game agrees immediate action is required to give effect to the NPS-FW, and to effect a trajectory of change capable of achieving the Objectives of PC 1 and give effect to the Vision and Strategy.</p> <p>Long term consents should incorporate consent review dates and common subcatchment review periods (pp 69-74 Fish and Game submission) to ensure that updates if adjustments to science defined limits are required, the consents reflect these. Extended terms should only be available where performance standards ensure the consent holder will appropriately manage effects, including conditions that require appropriate reductions during that timeframe. Consents of an extended term should be consistent with the timeframe to phase out overallocation and sustainable management under the RMA.</p>	<p>ALLOW amendments so that methods are put in place now.</p> <p>DISALLOW any amendment to include long term consents UNLESS subject to a common subcatchment review framework and conditions and performance standards consistent with the timeframe to phase out overallocation and sustainable management under the RMA.</p>
General	PC1-13161	Support	Fish and Game has made similar submissions (pp 13-14).	ALLOW
General	PC1-13153	Oppose	Fish and Game considers the approach proposed in the Clean Water Package 2017 (Stock exclusion regulations have not yet been promulgated) to be a step in the right direction on a national level, but there are elements which require further consideration and provision at the Regional Plan level, and within the context of PC1 (as was anticipated would occur with the proposed regulations):	DISALLOW and ENSURE any amendment to stock exclusion provisions to account for slope is SUBJECT TO additional provisions which:



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<ul style="list-style-type: none"> Riparian buffers were not within the scope of the regulations, but the proposal noted that provision of a riparian buffer was best management practice and that regional councils should consider whether that should be required. The proposal does not apply to waterways under 1 m wide, ephemeral, intermittent waterways, wetlands and drains. Higher order streams account for 73% of NZ total N load and 84% NZ total P load. Stock exclusion requirements for protection of intermittent streams of second order or higher are necessary to promote sustainable management. Other livestock, including horses and sheep and their grazing effects on potentially sensitive waterbodies (ie; sensitive or outstanding waterbodies) are not included. <p>Fish and Game supports exclusion rules taking account of slope but considers additional provisions and measures to account for the above three factors listed are essential to promote sustainable management.</p>	<ul style="list-style-type: none"> Include riparian buffers and setbacks; include measures for sensitive and/or outstanding waterbodies; Include stock exclusion requirements for waterways under 1m; Address the effects of all livestock including on sensitive and/or outstanding waterbodies.
General	PC1-13154	Support in part and oppose in part	Fish and Game agrees that the NPS FM has not been given effect to for reasons at pp14-15 of its submission. The submitter additionally seeks amendment so that when formulating freshwater objectives and limits (including Table 3.11-1), the economic wellbeing, including productive economic opportunities, are provided for within the context of environmental objectives, attributes and limits. The NPS FM requires consideration of how to enable communities to provide for these factors, while managing within limits. Objectives and limits must give effect to the Vision and Strategy and apply Part 2 of the RMA.	Amendment must give effect to with NPS FM, the Vision and Strategy and apply Part 2 RMA. Otherwise DISALLOW
General	PC1-13155	Support	The submission raises concerns relating to the s 32 analysis. Fish and Game shares these concerns.	Address concerns in s32 report.
General	PC1-13156	Support in part with	The submitter seeks amendments for an alternative Nitrogen management and allocation method in accordance with the principles in Appendix 1; modification	ALLOW modified objectives, policies and rules relating to



Statutory managers of freshwater sports fish, gamebirds and their habitats.

		<p>amendment and oppose in part</p>	<p>to these parts of the proposal to address the effects of Nitrogen in line with the principles promotes sustainable management.</p> <p>While Fish and Game agrees that amendment so that allocation methods achieve limits, targets and objectives set by PPC1 is required, the limits targets and objectives of PPC also require amendment so that they are within the assimilative capacity of water and achieve ecosystem health throughout the catchment, rather than Nitrogen toxicity, as set out pp 10-11 Fish and Game submission.</p> <p>The use of transfers within an allocation regime consistent with the principles stated by the submitter as an alternative to the NRP approach supported as equitable, efficient and enduring.</p> <p>Fish and Game acknowledges that the factors outlined (natural processes or the impacts of regionally or nationally significant infrastructure) may cause water quality outcomes which exceed bottom lines under the NOF, but considers that unless Policy CA3 a) and b) of the NPS FM applies, the limits in PC1 should not be exceeded.</p> <p>Fish and Game supports an amended and strengthened sub-catchment approach and provisions that facilitate and support the establishment and operation of sub-catchment collective groups provided the scope of such groups' management responsibilities should be clearly defined and within stated environmental limits.</p> <p>Subject to this occurring within environmental limits, Fish and Game supports the provisions of the plan supporting and facilitating innovative and viable businesses and communities working together collectively to improve water quality. Edge of field mitigations are effective and must be used appropriately as set out within the RMA mitigation hierarchy and subject to standards to ensure</p>	<p>management of N SUBJECT TO amendment to achieve ecosystem health rather than N toxicity.</p> <p>ALLOW amendment of so that allocation methods achieve limits, targets and objectives, SUBJECT TO amendment to achieve ecosystem health rather than N toxicity.</p> <p>ALLOW amendment that nitrogen loads are allocated within sub-catchments and the associated transfer regime.</p> <p>DISALLOW exceptions to allow water quality outcomes below limits.</p> <p>ALLOW amended sub-catchment approach and provisions which facilitate and support the establishment and operation of sub-catchment groups and provisions to support and facilitate</p>
--	--	-------------------------------------	---	--



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>they are enduring.</p> <p>Fish and Game supports that regulatory methods be tailored on a sub-catchment or watershed basis, but this must occur while addressing environmental issues of a cumulative nature in all downstream sub-catchments and FMUs, including the coastal waters of the Waikato Estuary, pursuant to the RMA and to give effect to the NPS-FW and the NZCPS.</p>	<p>innovative and viable businesses and communities working together to improve water quality PROVIDED this occurs within/to specified environmental limits/targets and timeframes.</p> <p>ALLOW a subcatchment tailored approach SUBJECT TO this addressing effects (including cumulative) in all downstream subcatchments, FMUs, including the Estuary.</p>
General	PC1-13157	Support	<p>The amendments sought reflect a holistic, farm system approach, rather than fragmenting activities. This is supported for the reasons in pp14-15 Fish and Game submission and consistent with the RMA (ss9, 15 and 70 RMA).</p>	ALLOW
General	PC1-13158	Oppose	<p>Fish and Game agrees that low risk activities should be enabled in preference over high risk activities, however provisions should relate specifically to contaminants discharged, rather than treating particular farming sectors differently, to ensure that contaminant losses can be managed within limits. The submitter seeks diverse systems and environmental constraints be recognised and provided for and that flexibility be afforded to such operations. Fish and Game is supportive of this approach, but only where this can be achieved within environmental limits which restore and protect ecosystem health (rather than N toxicity limits). In response to specific provisions the submitter seeks under submission point 39:</p> <ul style="list-style-type: none"> Fish and Game opposes any provision which would use existing 	<p>DISALLOW specific provision for drystock sector;</p> <p>DISALLOW acknowledging or offsetting benefits of biodiversity values EXCEPT where commensurate to the effect intended to be managed (ie contaminant loadings; freshwater ecosystem health);</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>biodiversity values to offset or mitigate contaminant losses or freshwater ecosystem health as the two are not always commensurate.</p> <ul style="list-style-type: none"> • Fish and Game supports removing any reference to requiring (grandparenting) farming operations to be held at historic Nitrogen discharge levels or stocking rates in principle, but opposes removal of such provision unless replaced with alternative provisions which allocate nitrogen discharges within ecosystem health based limits. • Fish and Game supports a focus on management of critical source areas, however does not consider that this precludes a standardised approach. 	<p>ALLOW replacement of grandparenting provisions with provisions allocating within ecosystem health based limits;</p> <p>DISALLOW removal of standards which apply up to a 25 degree slope, BUT ALLOW management which includes critical source areas.</p>
General	PC1-13159	Support with amendment	<p>Additional provisions which ensure that the life supporting capacity of water and soil ecosystems are safeguarded is supported provided this is applied with regard to the needs of future generations and gives effect to the Vision and Strategy.</p> <p>The submitter seeks to add provisions so that freshwater resource use (assimilative capacity) is necessary, reasonable and efficient. Fish and Game wishes to clarify that the assimilative capacity of water and soils should be determined according to science defined ecosystem health limits rather than based on the use of the resource (or N toxicity, as set out in Fish and Game submission at pp10-11), however supports that resource use be necessary, reasonable and efficient in line with the RMA.</p>	<p>ALLOW amendments SUBJECT TO clarification that assimilative capacity of water and soils is according to science defined ecosystem health limits rather than based on the use of the resource or N toxicity.</p>
Full achievement of the vision and strategy will be intergenerational	PC-11146	Support in part with amendment	<p>Fish and Game supports sub catchment groups' role as operating within the context of Policy CA2 NPSFM.</p> <p>Fish and Game agrees that amendment of Paragraph 1 is required. The reliance on innovation (PPC1 cites the "innovation gap" as the reason for delay in "full achievement of water quality") for future improvements does not give the certainty required as to changes needed. Reliance on innovation and</p>	<p>ALLOW amendment for explicit recognition of the role of sub-catchment groups as operating within the context of Policy CA2 NPSFM.</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>development of new practices is speculative and lacks a clear signal of the changes required to ensure Objectives can be met. Additionally, the statement does not include primary reasons for a staged approach, including investment and time taken to implement on-farm changes, and lag between on-land changes and changes in water quality. If these reasons are not identified, PPC1 many not embark on sufficient incremental improvements to achieve its Objectives, or give effect to the NPS-FW and the Vision and Strategy.</p> <p>The submitter seeks an additional bullet point on page 15. Fish and Game support a) and b) of that amendment subject to amendment to the Values. As proposed, the non-specific Values in PPC1 may be satisfied along a broad continuum of water quality (for example supporting native freshwater fish species may occur where less sensitive species are supported, while others are affected); Values must be refined, including species and habitats for FMUs or sub-catchments. Fish and Game supports the recognition of accelerated eutrophication and sedimentation of lakes, but this outcome should be prevented or “avoided” rather than minimised, to be consistent with the Vision and Strategy and RMA.</p> <p>The submitter seeks that bullet point 3 relating to the NRP be deleted. Fish and Game supports removal of this provided an alternative, more efficient and effective, enduring approach of allocation is included and implemented.</p> <p>The submitter seeks amendment to bullet point 5. The amendments set a higher standard for facilitating mitigation on a sub-catchment scale.</p>	<p>ALLOW amendment to Paragraph 1.</p> <p>ALLOW amendment to include an additional bullet point SUBJECT TO refinement of Values and further amendment of: minimised <u>avoided</u>.</p> <p>ALLOW deletion of reference to NRP (bullet point 3) SUBJECT TO including and implementing an alternative Nitrogen allocation methodology.</p> <p>ALLOW amendment to bullet point 5.</p>
3.11.1 Values and uses for the Waikato and	PC1-11149	Support with amendment	<p>The submitter seeks that Values are incorporated with Objectives and a new Objective 1A or amendment to existing Objectives to give effect to the intent “<i>Water Management Values: Surface water bodies are managed in a manner</i></p>	<p>ALLOW amendment SUBJECT TO refinement of Values.</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Waipā Rivers			<p><i>which safeguards their life supporting capacity and recognises and provides for the Values in Section 3.11.1.</i> Fish and Game agrees that a clear link between Objectives and Values which ensures Objectives recognise and provide for the freshwater Values identified is necessary however, considers further amendment to the Values will be required as set out above under PC-11146.</p>	
3.11.2 Objectives	PC1-11150	Oppose in Part and Support in part with amendments	<p>The submitter seeks amendment and new Objectives based on the values of freshwater. Fish and Game relies on its submission at p19 and considers that that primarily, the Objectives should give effect to the Vision and Strategy.</p> <p>The submitter seeks the limits and targets in Table 3.11-1 be removed, changed to Freshwater Objectives and added as Objectives. Fish and Game considers these are Freshwater Objectives. Fish and Game have submitted that the attributes, limits and targets in Table 3.11-1 should be amended to be consistent with ecosystem health measures and achieving healthy freshwater ecosystems rather than Nitrogen Toxicity (pp10-11). Fish and Game has sought amendment to ensure that attribute targets are clearly linked to the desired freshwater outcomes (pp20-21).</p> <p>The submitter seeks that Objectives recognise and provide for the establishment of collaborative sub-catchment groups. Fish and Game considers collaborative sub-catchment groups are more appropriately housed under the Methods section of PC1. Subcatchment groups should be provided for within a framework which guides them to be successful in achieving the healthy, swimmable and fishable outcomes required under the Vision and Strategy. Subcatchment groups' management responsibilities should be clearly defined and within stated environmental limits and timeframes.</p>	<p>DISALLOW amendment of Objectives so that they are based on Values and ENSURE Objectives give effect to the Vision and Strategy.</p> <p>DISALLOW amendments which reformulate Freshwater Objectives UNLESS these reflect the swimmable, ecosystem health and food gathering goals and give effect to the Vision and Strategy and NPSFM.</p> <p>DISALLOW amendments for an Objective to recognise and provide for subcatchment groups.</p> <p>ALLOW amendments to ensure that resource use is efficient including an allocation framework for nitrogen if</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>The submitter seeks amendment or new Objectives that:</p> <ul style="list-style-type: none"> • ensure resource use is efficient including through nitrogen allocation frameworks if nitrogen is required to be allocated. Fish and Game supports for the reasons in pp10 –15 of its submission; • take into account the natural capital of soils, climate, geology, and the assimilative capacity of water. Fish and Game supports these considerations as relevant to managing for freshwater ecosystem health, however their inclusion must be based on science defined limits and the precautionary approach where scientific knowledge is unclear or incomplete. • provide for the economic and social wellbeing of people and communities, people and community resilience, adaptive management, and sub catchment approaches led by communities. This overlaps with existing proposed Objectives 2 and 4, and the focus should be on sustainable management of natural and physical resources to ensure that these resources are managed in a way, or at a rate, that enables people and communities to provide for their social, economic and cultural wellbeing. The focus should be expanded to recognise the benefits of restoration and protection and the requirement that resources are sustainably managed. • ensure that limits and targets are set appropriately and enable the economic and social wellbeing of people and communities and ensure that they are resilient, vibrant and future proofed. Freshwater limits and targets should be set to achieve the swimmable, health, and food gathering water quality goals and give effect to the Vision and Strategy. Ecosystem health based limits and targets must reflect health rather than toxicity. 	<p>required.</p> <p>ALLOW an Objective which takes into account assimilative capacities of soil and water SUBJECT TO this being based on science defined limits and application of the precautionary principle.</p> <p>ALLOW amendment to provide communities with certainty as to what is required of them.</p> <p>ALLOW amendment to distinguish between Freshwater Objectives, Attributes, Limits and Targets and include appropriate numerical parameters for periphyton, chlorophyll a, MCI, sediment and clarity.</p> <p>Otherwise DISALLOW amendments sought.</p>
--	--	--	---	--



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>The submitter seeks amendment to provide communities with certainty as to what is required of them. Fish and Game supports this and relies on the reasons in PC1-11489.</p> <p>The submitter seeks that Objectives are amended to make a clear distinction between Freshwater Objectives, Attributes, Limits and Targets, with Freshwater Objectives including values of freshwater such as cultural, ecological, primary production, commercial and recreational and may include numerical parameters for periphyton, chlorophyll a, MCI, sediment and clarity. Fish and Game support clear distinctions but considers that Freshwater Objectives must be formulated according to the NPS FM requirements. The inclusion of appropriate numerical parameters for periphyton, chlorophyll a, MCI, sediment and clarity, as the current parameters are not sufficient.</p>	
Objective 1	PC1-11154	Support with amendment	<p>The submitter seeks an additional Objective (1A) that surface water bodies are managed in a way that safeguards life supporting capacity and recognises and provides for Values. Fish and Game support this objective in addition to a new objective requiring the restoration and protection of ecosystem health.</p> <p>The submitter seeks an additional Objective (1B). Fish and Game support a) and b) of that amendment subject to amendment to the Values and relies on the reasons in relation to this set out under PC-11146.</p>	ALLOW amendments sought subject to refinement of Values.
Objective 2	PC1-11233	Support with amendment	<p>Fish and Game considers that overall, Objective 2 should focus on sustainable management of natural and physical resources to ensure that these resources are managed in a way, or at a rate, that enables people and communities to provide for their social, economic and cultural wellbeing. The Objective should also recognise the benefits to the environment of restoration and protection and the requirement that resources are sustainably managed. The decision requested should include the following amendment: "<u>Sustainable</u> management</p>	DISALLOW amendment to Objective 2.



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			of land and water resources within the Waikato River Catchment...”.	
Objective 3	PC1-11482	Support with amendment	<p>The submitter seeks amendment to provide for and enables management approaches tailored to the sub-catchment unit or waterbody and which specifically focus on the issues identified for that waterbody. PC1 does not take into account the important values of sub-catchments or the sensitivity of individual waterbodies. Management should be linked to these factors, including management objectives for improving water quality. High priority should be given to management approaches for lakes and wetlands. Fish and Game supports tailored sub catchment management approaches provided they also recognise the interactions between freshwater, land, associated ecosystems and the coastal environment consistent with integrated management, including cumulative effects at the Waikato Delta and coastal environment where sediments and nutrients ultimately arrive.</p> <p>The submitter seeks removal of the reference to 10%, introduction of interim targets and timeframes, and extension of timeframes. Fish and Game seeks an appropriate quantum of change (beginning a trajectory capable of meeting 80 year target as adjusted to meet the healthy, swimmable and mahinga kai goals of PPC1 and give effect to the Vision and Strategy) being targeted for. Interim targets and timeframes must enter into a trajectory of improvement capable of meeting such limits.</p>	<p>ALLOW approaches for management tailored to issues within subcatchments, SUBJECT TO implementing integrated management which recognises cumulative effects on downstream environments.</p> <p>DISALLOW amendment to timeframes.</p>
Objective 4	PC1-11483	Support in part with amendment and oppose in part	<p>The submitter seeks to add a new objective; reasons are covered in PC1-11150 above.</p> <p>The submitter seeks deleting references to a ‘staged approach’ and replacing this with adaptive management Objectives and Policies. Fish and Game considers that this would reduce uncertainty around further contaminant reductions and action required by landowners by giving a clearer signal of how change will be</p>	<p>DISALLOW amendment to give effect to the intent UNLESS:</p> <ul style="list-style-type: none"> • Adding the word: to <i>protect and restore the values for freshwater...</i> • Defining the proposed “where degraded”



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>required.</p> <p>The submitter seeks that the Objective give effect to an intent; Fish and Game supports the intent described, which includes a focus on sustainable management, values of freshwater and future generations. The amendment should be amended to include the following addition: “to protect and <u>restore</u> the values for freshwater...”. Amendment is also required to define the proposed “where degraded”; this should be determined based on scientific knowledge of ecosystems and their intrinsic values. Fish and Game relies on reasons under PC1-11482 in relation to subcatchment approaches.</p> <p>The submitter seeks amendments to targets and timeframes, and amendment of interim targets so that they progressively reduce overallocation; Fish and Game relies on the reasons under PC1-11482.</p> <p>The submitter seeks a pathway within Objective 4 and Table 3.11.1 for individuals and communities to work together to achieve the Vision and Strategy over the long term. Fish and Game is not clear how such a pathway would be included in either an Objective or the Table.</p>	<p>based on scientific knowledge of ecosystems and their intrinsic values;</p> <ul style="list-style-type: none"> • Incorporating integrated management into the sub catchment approach. <p>DISALLOW amendment to timeframes.</p> <p>Otherwise DISALLOW amendments sought.</p>
3.11.3 Policies	PC1-11484	Support in part with amendment and oppose in part	<p>The submitter seeks amendments to the policies to give effect to proposed Objectives 1A and 1B; Fish and Game refers to its reasons above under PC1-11154, and for those reasons supports giving effect to those Objectives. Where managing ‘up to’ limits enables degradation beyond current state, this is opposed as inconsistent with the Vision and Strategy and NPSFM. Fish and Game agrees that where limits/targets are not currently met, management should require progressive improvement to meet the 2096 targets, and/or the values (subject to Fish and Game’s reasons above under PC1-11154).</p> <p>Fish and Game supports the amendment that if nitrogen is to be allocated,</p>	<p>ALLOW amendment to give effect to proposed objectives that requires targets to continue to be met and progressive improvement where limits and targets are not currently met.</p> <p>DISALLOW amendment to give effect to proposed objectives</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>setting out how nitrogen will be allocated and discharges managed (according to nutrient allocation principles in Appendix 1).</p> <p>Fish and Game supports sub catchment groups, and global consents in addition to existing methods, provided they are subject to limits and targets and timeframes, and rules designed to ensure these are met.</p>	<p>that enables degradation beyond current state.</p> <p>ALLOW amendment that if nitrogen is to be allocated, include a policy setting out how nitrogen will be allocated and discharges managed.</p> <p>ALLOW amendment to provide for subcatchment groups SUBJECT TO amendment to ensure they operate within stated environmental limits and timeframes.</p>
Policy 1	PC1-11485	Support in part with amendment and Oppose in part	<p>The submitter seeks amendment to enable land users which are less than or equal to 20ha, or which are leaching at or less than the ‘sustainable level’ to continue to provide them with flexibility to change farm systems or stocking rates up to the ‘sustainable level’. Fish and Game does not support any further intensification of farm systems or stocking rates, unless the ‘sustainable level’ is defined. The ‘sustainable level’ must not contribute to the in-stream load, and not result in further instream degradation as determined by science and applying a precautionary approach. Where these conditions are met, a Policy which enables land users leaching at less than the ‘sustainable level’ to continue to have flexibility as to stocking rates and farm systems up to that level is possible. Flexibility should relate to the operation’s leaching levels relative to the ‘sustainable level’, as this criteria has a tangible link to the management of contaminants, and as such is effective and efficient as opposed to an arbitrary</p>	<p>DISALLOW amendment to continue to provide flexibility to change farm systems or stocking rates up to the ‘sustainable level’ UNLESS the ‘sustainable level’ is defined and does not contribute to the in-stream load, or result in further instream degradation as determined by science and applying a precautionary approach.</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

		<p>'land area used' criteria (ie, less than 20ha) which could frustrate the efficacy of allocation within limits or to targets.</p> <p>Some amendment to rules and policies would be required to ensure that limits and/or targets can be met by land users within a more effective, efficient and enduring allocation regime.</p> <p>The submitter seeks amendment to ensure that the allocation and management framework for N 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 all the allocation principles set out under Appendix 1. Fish and Game relies on the reasons above under PC1-13156.</p> <p>The submitter seeks amendment of PC1 to manage or allocate N based on:</p> <ol style="list-style-type: none"> a. Flat rate per ha permitted threshold; OR b. Natural capital or land use suitability based allocation per ha where N load is attributed to land based on its underlying characteristics and factors (including productive capability using LUC); AND c. Natural capital or land use suitability based threshold for the discharge of N per ha based on calculating a sub-catchment N load and focussing on priority areas where N is over allocated. <p>All approaches sought enable quantification of the load received by the catchment under the operation of the plan and management accordingly and as such are preferred by Fish and Game as opposed to the current approach which does not quantify the input of N it seeks to enable, and as such does not ensure management actions will meet Objectives, limits and targets, or enable progress towards short- and long- term outcomes to be assessed and regulatory</p>	<p>DISALLOW amendment which would enable this to occur for land users based solely on the operation being less than or equal to 20ha.</p> <p>ALLOW amendment, if N is to be allocated through PPC1, to Policies and Rules (such as 3.11.5.1 – 3.11.5.7) to set out how N will be allocated and discharges managed.</p> <p>ALLOW amendment to ensure that the allocation and management framework for N promotes the efficient use of natural resources and incentivises activities and behaviour change which promote the sustainable management of natural resources.</p> <p>ALLOW amendment of PC1 to manage or allocate N based on a criterion specified in a), b) or c), within limits.</p>
--	--	---	---



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>standards to be adjusted accordingly as the long-term progresses.</p> <p>The submitter seeks to amend Policy 1 and Table 3.11-1 or add a new Policy which sets out:</p> <ul style="list-style-type: none"> a. The current N load (including both the allowable in-stream nitrate load to achieve the 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); b. Desired N load (including both the allowable in-stream nitrate load to achieve the desired in-stream Nitrogen concentration and the MAZL which accounts for attenuation and provides the load that can be allocated to land); c. N discharge rate/ha/year to achieve current N load; d. N discharge rate/ha/year to achieve desired N load. <p>Fish and Game supports inclusion of these parameters, subject to the desired in-stream load being based on achieving the in-stream concentration limits and targets set in Table 3.11-1 which must achieve the swimming, mahinga kai, and ecological health goals of PPC1, give effect to the Vision and Strategy and the NPSFM. Fish and Game considers quantification of inputs to be managed (ie MAZL) must ensure that desired loads and concentrations can be met in-stream and therefore be subject to refinement and review over time.</p> <p>The submitter seeks amendments that:</p> <ul style="list-style-type: none"> f. Activities that would cause the maximum catchment load to be exceeded are avoided. g. In catchments that are already overallocated, PPC1 should avoid allocating any further N. h. In catchments that are already over allocated, PPC1 should put in place Methods (such as a 'sinking lid' on the allocation) so that overtime over 	<p>ALLOW amendment of Policy 1 and Table 3.11-1 or new Policy to set out loads and discharge rates as set out in a), b), c) and d) SUBJECT TO the desired in-stream loads being sufficient to achieve in-stream concentration limits and targets set in Table 3.11-1 to achieve the swimming, mahinga kai, and ecological health goals of PPC1, the Objectives of the Plan, and give effect to the Vision and Strategy and the NPS, and ENSURE MAZL achieves desired loads and concentrations in-stream and is subject to refinement and review over time.</p> <p>ALLOW amendments to include provisions f), g) and h).</p> <p>ALLOW amendment so that activities and land uses which contribute to the most to overallocation bear the</p>
--	--	--	--	---



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>allocation is phased out.</p> <p>Fish and Game supports these provisions approach as it gives effect to the ecological health goals of PPC1, the Objectives of the Plan, the Vision and Strategy and the NPS.</p> <p>The submitter seeks amendment to ensure that activities and land uses contributing the most to the overallocated parameter bear the majority of the cost of reducing overallocation. This approach is equitable, efficient and effective and consistent with sustainable management under the RMA.</p> <p>The submitter seeks amendment of Policy 1(a) to ensure that low discharging land uses are enabled to continue and are provided with flexibility to change farm systems and stocking rates up to the 'sustainable level' for the subcatchment and FMU. Fish and Game considers <20kgN/ha to be too high to fall under a permitted activity classification in this context, and supports the existing <15kgN/ha in PPC1, however does not consider this to be necessarily the 'sustainable level'. Fish and Game does not support any further intensification of farm systems or stocking rates, unless the 'sustainable level' meets the criteria outlined above in this submission point [PC1-11485].</p>	<p>majority of the cost of reducing overallocation.</p> <p>DISALLOW amendment to Policy 1(a) to allow discharges of <20KgN/ha as a permitted activity.</p>
Policy 1	PC1-12575	Support in part with amendment and oppose in part	<p>Fish and Game supports the subcatchment approach subject to implementing integrated management as set out in PC1-11482.</p> <p>The submitter seeks amendment to establish subcatchment groups. Fish and Game provisionally supports the submission for the reasons set out above in PC1-13156. The use of global consents as set out in the submission is supported and consistent with Fish and Game's submission on Rule 3.11.5.4.</p> <p>The submitter seeks amendment of Policy 1 so that land use rules and</p>	<p>ALLOW management approaches which tailor addressing water quality issues on a sub-catchment basis, SUBJECT TO addressing effects (including cumulative effects) in all downstream sub-catchments and FMUs, including the Waikato Estuary.</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>management frameworks include both land use and ancillary discharges. This is consistent with Fish and Game’s submission and ss9 and 15 RMA.</p> <p>The submitter seeks amendment to establish nutrient user groups within sub-catchment collectives and enabling the transfer of nutrients at a level not exceeding the desired in-stream nutrient load, where specified provisos are met. Fish and Game supports the provisos sought by the submitter and considers them essential if nutrient transfer is adopted, as without these limitations, the ability for subcatchments to achieve desired in-stream loads and concentrations required to achieve ecosystem health would be frustrated.</p> <p>The submitter seeks amendment so that Policy 1 applies Policies 12 and 13 and requires BPO. Fish and Game supports the submission as equitable, subject to extension of the amendments to Policies 12 and 13 sought by Fish and Game (pp31-34).</p> <p>The submitter seeks amendment to include a new Policy 1A or amendment to Policy 1 to give effect to Objective 1A and 1B. Fish and Game relies on reasons above under PC1-11154 and PC1-11484.</p>	<p>ALLOW amendment to establish subcatchment groups working through global consents.</p> <p>ALLOW amendment to include both land use and ancillary discharges.</p> <p>ALLOW nutrient user groups including with all provisos and preclusions specified by the submitter.</p> <p>ALLOW amendment so that Policy 1 applies Policies 12 and 13 SUBJECT TO extension of the amendments to policies 12 and 13 sought by Fish and Game.</p> <p>DISALLOW amendment to give effect to proposed objectives 1A and 1B that enables degradation beyond current state and ENSURE any amendment gives effect to with NPS FM, the Vision and</p>
--	--	--	--	--



Statutory managers of freshwater sports fish, gamebirds and their habitats.

				Strategy and apply Part 2 RMA.
Policy 1	PC1-12576	Support in part with amendment and oppose in part	Fish and Game does not support the removal of “provided those discharges do not increase” unless increases enabled are within a limit set to achieve in-stream ecosystem health. The submitter seeks amendment of Policy 1 b). Fish and Game supports the approach, subject to reasons above under Policy 1 a). Where progressive reductions in allocation are required over time to reduce over allocation, the ‘sustainable level’ must achieve the desired in-stream load set to achieve in-stream ecosystem health. In addition, fish and Game relies on the reasons set out at p 24 of its submission.	DISALLOW amendment UNLESS increases enabled are within a limit set to achieve in-stream ecosystem health and clarification of the links between a) and b) and the relevant rules.
Policy 1	PC1-12577	Support in part with amendment and oppose in part	<p>Fish and Game agrees with flexible stock exclusion and mitigation options for low intensity farms of over 15 degrees, and considers that the investment required for permanent fencing in these contexts may be better spent on alternative options, including critical source management. Complete removal of stock exclusion requirements for these slopes is however opposed as too blunt, and not necessary, given the role of FEPs and various rules which provide options for these activities. The Policy to progressively exclude stock from waterways addresses one important source and pathway of contaminants into waterways and should guide livestock farmers in considering their potions.</p> <p>Fish and Game oppose amendment to the clear statement in Policy 1 of the requirement to progressively exclude livestock (excluding sheep) from waterbodies listed. Any flexibility is better housed in the Rule and FEP provisions and must include:</p> <ul style="list-style-type: none"> • Clear definitions for intensive, low intensity, hill country farming and “break fed”; • Should provide flexibility to land users who are both low intensity and hill country farmers (rather than either one or the other); • Higher standards and more prescriptive provisions in relation to some sensitive waterbodies and downstream environments (wetlands and 	<p>DISALLOW amendment to Policy 1 AND ENSURE any amendment Rules or Schedule 1 to enable flexibility for stock exclusion on steeper slopes occurs SUBJECT TO:</p> <ul style="list-style-type: none"> • This applying for low intensity, hill country farming operations; • Clear definitions where required of intensive, low intensity, hill country farming and “break fed”; • Higher standards with more prescription in relation to specified sensitive waterbodies; • Increased focus on setback distances and buffering between livestock and



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>Whangamrino Wetland complex).</p> <p>A greater focus is necessary on larger setback distances and buffering between livestock and waterways, and a on intermittent and ephemeral waterways as part of mitigating the effects of stock on waterways at all slopes.</p>	<p>waterways.</p>
Policy 2	PC1-11487	Support in part and oppose in Part	<p>Fish and Game relies on its reasons in PC1-12575 regarding tailored management approaches on a sub-catchment basis.</p> <p>The submitter seeks amendment to incentivise and support collaborative community groups working together through long term, global sub-catchment land use consents, including land use change. Fish and Game relies on its reasons above at PC1-13160 and PC1-12575 regarding term and global consents respectively.</p> <p>Fish and Game relies on its reasons in PC1-13153 regarding the recommendations in the government’s clean water 2017 document.</p>	<p>ALLOW management approaches which tailor addressing water quality issues on a sub-catchment basis, SUBJECT TO addressing effects (including cumulative effects) in all downstream sub-catchments and FMUs, including the Waikato Estuary.</p> <p>DISALLOW any amendment to include long term global consents UNLESS short term or subject to a common subcatchment review framework and appropriate conditions and performance standards consistent with the timeframe to phase out overallocation and sustainable management under the RMA.</p> <p>DISALLOW amendments relating to the clean water 2017 document.</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Policy 2	PC1-12708	Support in part with amendment and oppose in part	Fish and Game relies on the reasons under PC1-12577.	<p>DISALLOW amendment to Policy 2 AND ENSURE any amendment Rules or Schedule 2 to enable flexibility for stock exclusion on steeper slopes occurs SUBJECT TO:</p> <ul style="list-style-type: none"> • This applying for low intensity, hill country farming operations; • Clear definitions where required of intensive, low intensity, hill country farming and "break fed"; • Higher standards with more prescription in relation to specified sensitive waterbodies; • Increased focus on setback distances and buffering between livestock and waterways.
Policy 2	PC1-12709	Support in part with amendment and oppose in part	Fish and Game relies on the reasons under PC1-11485.	<p>DISALLOW amendment to enable land users which are leaching at or less than the 'sustainable level' to continue to provide them with flexibility to change farm systems or stocking rates up to the</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

				'sustainable level' UNLESS the 'sustainable level' is defined and does not contribute to the in-stream load, or result in further instream degradation as determined by science and applying a precautionary approach.
Policy 2	PC1-12710	Support with amendment	Fish and Game support amendment of that will reduce manage at a property or enterprise level subject to further amendment to PPC1 which ensures that the required reductions to remove overallocation of instream contaminant loads within overallocated sub catchments and within the Waikato Catchment as a whole are implemented.	ALLOW amendment SUBJECT TO amendment throughout PC1 to reduce and remove all instances of overallocation.
Policy 2	PC1-12711	Support with amendment	<p>Fish and Game supports the deletion of 2(d) and replacement of the text stated subject to:</p> <ul style="list-style-type: none"> • Further amendment to PPC1 which ensures that the required reductions to remove overallocation of instream contaminant loads within overallocated sub catchments and within the Waikato Catchment as a whole are implemented. • Amendment to the water quality outcomes in Table 3.11-1 so that they reflect the swimmable, healthy and food gathering goals of PPC1. <p>Fish and Game relies on the reasons set out in PC1-12575 in relation to policies 12 and 13.</p>	<p>ALLOW amendment SUBJECT TO further amendment of PPC1 to reduce and remove all instances of overallocation and amend the water quality outcomes in Table 3.11-1 so that they are consistent with the swimmable, healthy and food gathering goals of PPC1.</p> <p>ALLOW amendment so that Policy 1 applies Policies 12 and 13 SUBJECT TO the amendments to policies 12 and 13 sought by Fish and Game.</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Policy 4	PC1-11488	Support in part with amendment and oppose in part	<p>The submitter seeks amendment to allow flexibility for small scale (<20ha), low intensity and low discharging activities. Provided all 3 criteria are required to be met (rather than either one or another), a sustainable level is determined, and an allocation framework implemented, Fish and Game supports the submission and relies on the reasons above under PC1-11485.</p> <p>Fish and Game refers to PC1-13158 in relation to recognition of existing biodiversity values on private land.</p>	<p>ALLOW amendment to enable flexibility for low discharging activities through permitted thresholds SUBJECT TO the definition for small scale/low leaching/low intensity including a rate of N loss, or live weight carrying capacity, or LUC based allocation which achieves instream loads consistent with ecosystem health based limits and/or targets.</p> <p>DISALLOW recognising or offsetting benefits of biodiversity values UNLESS they are commensurable to the effect intended to be managed (ie contaminant loadings; freshwater ecosystem health).</p>
Policy 5	PC1-11489	Support in part and oppose in part	<p>Fish and Game supports the amendment to the wording of Policy 5 proposed as it provides clarity and direction to those who will be required to make reductions.</p> <p>The submitter seeks amendment to include tailored management approaches, establishment of sub catchments groups, implementation of its proposed Objectives 3 and 4, and interim targets and timeframes. Fish and Game opposes these amendments to Policy 5 which should relate to taking a staged approach to change rather than the specifics of how this is to be achieved, which are</p>	<p>ALLOW amendment to wording of Policy 5.</p> <p>DISALLOW other amendments to Policy 5.</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			adequately covered elsewhere in the submitters proposed amendments to other provisions of PPC1.	
Policy 6	PC1-11491	Oppose in part and support in part with amendment	<p>The amendment to the wording of the heading is unnecessary as the plan will still restrict land use change on the whole under either drafting.</p> <p>Fish and Game opposes providing for increase in N discharge based on enhancement of biodiversity values unless the biodiversity values relate to in-stream biodiversity and ecosystem health. Fish and Game opposes specific provision for increase in one contaminant (N) and considers any such provision requires implementing integrated management as in regards to the effects of the contaminant from the source down to the sea.</p> <p>Other amendments sought are supported subject to amendment to the plan change elsewhere to ensure an equitable framework which ensures overallocation of all contaminants is progressively removed is implemented. In relation to the 'sustainable level', Fish and Game relies on the reasons in PC1-11485.</p>	<p>DISALLOW amendment to wording sought.</p> <p>DISALLOW amendment to enable land users which are leaching at or less than the 'sustainable level' to continue to provide them with flexibility up to the 'sustainable level' UNLESS the 'sustainable level' is defined and does not contribute to the in-stream load, or result in further instream degradation as determined by science and applying a precautionary approach.</p> <p>DISALLOW providing for increase in N discharge based on enhancement of biodiversity values UNLESS those values relate to in-stream biodiversity values and ecosystem health as impacted by N, and integrated</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

				management is applied.
Policy 7	PC1-11491	Support	The submitter seeks a method implementing an allocation framework now rather than in the future. This is supported; Fish and Game relies on the reasons set out in PC1-13156.	ALLOW amendments sought SUBJECT to Sub catchment numerical limits being set to achieve ecosystem health and the healthy, swimmable and food gathering goals of the plan change, and give effect to the Vision and Strategy and NPSFM.
Policy 8	PC1-11492	Support	The amendments promote sustainable management under the RMA and are efficient and effective, and consistent with giving effect to the Vision and Strategy and are supported. Sub catchment numerical limits should be set to achieve ecosystem health and the healthy, swimmable and food gathering goals of the plan change, and give effect to the Vision and Strategy and the NPS FM.	ALLOW amendments sought SUBJECT TO Sub catchment numerical limits being set to achieve ecosystem health and the healthy, swimmable and food gathering goals of the plan change, and give effect to the Vision and Strategy and NPSFM.
Policy 9	PC1-11493	Support	The amendments sought are consistent with sustainable management under the RMA and are supported. The new method sought enables and supports land management decisions targeted to a sub-catchment level.	ALLOW amendments sought.
3.11.4 Methods	PC1-11494	Support	The new Method is supported for the reasons above under PC1-11493.	ALLOW new method. DISALLOW remainder of submission point.
3.11.4.2	PC1-11495	Oppose	Expansion of CISs so that they do not cause fragmentation across sub catchments according to industry type would be an improvement, however the amendments proposed are not sufficiently specific to justify inclusion and expansion of the provision.	DISALLOW and remove the method.



Statutory managers of freshwater sports fish, gamebirds and their habitats.

3.11.4.3	PC1-11496	Support in part and oppose in part	<p>The submitter seeks amendment in accordance with the changes sought in Schedule 1. Fish and Game considers specific amendment to the Method to reflect these changes is unnecessary.</p> <p>The submitter seeks removal of Certified Farm Environment Planner; CFEPs are required to certify plans and this is an important part of the regulatory process, so the amendment is opposed; however, Fish and Game does not consider that CFEPs are necessarily needed to “prepare” FEPs as indicated in the Method where the enterprise has the required expertise and/or follows Council-promulgated guidelines.</p> <p>Fish and Game supports greater links between FEPS priorities and empowering a sub-catchment approach, as the sub-catchment approach can inform landowners in drafting FEPs which have the highest quality outcomes in terms of improvements.</p>	<p>DISALLOW amendment in accordance to changes sought in Schedule 1.</p> <p>DISALLOW removal of CFEPs.</p> <p>ALLOW greater links between FEPS priorities and empowering a sub-catchment approach.</p>
3.11.4.5	PC1-11497	Support	The amendments are consistent with sustainable management and are supported.	ALLOW
3.11.4.7	PC1-11498	Support	The amendments are consistent with sustainable management and are supported.	ALLOW
3.11.4.8	PC1-11499	Support	The amendments are consistent with sustainable management and are supported.	ALLOW
3.11.5	PC1-11500	Part support and part oppose	<p>The submitter seeks a new discretionary rule for where standards and conditions of Rules 3.11.5.1 to 3.11.5.6 are not met. Fish and Game opposes the introduction of a discretionary rule.</p> <p>The submitter seeks amendment if Nitrogen is to be allocated through PPC1. Fish and Game supports the submission and relies in the reasons in PC1-11485.</p>	<p>DISALLOW new discretionary rule.</p> <p>ALLOW amendment that if N is to be allocated through PPC1 the amendment to Policies and Rules (such as 3.11.5.1 – 3.11.5.7) should occur to set</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

				out how N will be allocated and discharges managed.
3.11.5.1	PC1-11501	Oppose	The submitter seeks the rule be amended to include a classification of small and low intensity farms up to 20ha and to include enterprises being undertaken on more than 1 property and remove existing criteria relating to stocking unity. Amendments to allow for activities on small to medium low intensity farms are covered under the amendments to 3.11.5.2, and expansion of 3.11.5.1 is unnecessary. This activity is best retained as drafted to continue to provide a permitted activity standard which is based on clearly defined input standards (ie stock units per ha).	DISALLOW
3.11.5.2	PC1-11502	Support with amendment and oppose in part	<p>The submitter seeks amendment in accordance with the changes sought in Schedule 1. This is supported subject to the amendments sought by Fish and Game to those changes at PC1-12364 for the reasons listed. The amendments to the rule description are supported as consistent with this approach and sustainable management.</p> <p>Fish and Game supports the removal of a – d, subject to amendment to the plan change elsewhere to ensure an equitable framework which ensures overallocation of all contaminants is progressively removed is implemented. In relation to the ‘sustainable level’, Fish and Game relies on the reasons in PC1-11485.</p> <p>Fish and Game opposes the removal of 3 e) as this is inconsistent with progressively excluding stock from waterways, and relies on the reasons above under PC1-12577.</p> <p>Fish and Game opposes the replacement of 15 with 20kgN/ha/year and considers 15kgN/ha/year to be an appropriate flat rate for low intensity farms.</p>	<p>DISALLOW amendments UNLESS there is:</p> <ul style="list-style-type: none"> • further amendment of PPC1 to reduce and remove all instances of overallocation and amend the water quality outcomes in Table 3.11-1 so that they are consistent with the swimmable, healthy and food gathering goals of PPC1. • Enabling only up to a ‘sustainable level’ and a rate of N loss that achieves instream loads consistent with ecosystem health based limits and/or targets;



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>Fish and Game supports the alternatives of the ‘sustainable level’ calculated in accordance with Policy 1 and 2 or a permitted threshold based on landuse capability as a proxy for land suitability, and amendment which enables flexibility in landuse, discharge and stocking rates up to these thresholds and standards and deletion of standards or clauses which refer to historic nutrient discharge levels or stocking rates provided there is further amendment to the plan change elsewhere to ensure an equitable framework which ensures overallocation of all contaminants is progressively removed is implemented. Fish and Game relies on the reasons above in PC1-11485.</p> <p>Fish and Game agrees with deleting “grazed” from 4 c) provided mitigations for these activities are retained (stock exclusion) and added (buffers).</p> <p>Fish and Game opposes the removal of the requirement that no winter forage crops are grazed in situ as this is a high risk activity and most mitigation criteria available for this activity would need to be included within the framework of accountability provided by FEPs. Further, the requirement only applies to more extensive farms over 20ha.</p>	<ul style="list-style-type: none"> • Including mitigations for grazing on slopes over 15 degrees (stock exclusion; buffers). • Ensuring grazing without fencing does not occur for high intensity activities (eg break feeding) over 15 degrees; • Applying larger buffers for cultivation on all slopes per the buffer schedule in Schedule D of Fish and Game’s submission. <p>DISALLOW deletion of 3 e);</p> <p>DISALLOW replacement of 15 with 20kgN/ha/year;</p> <p>DISALLOW amendment to 4 d).</p>
3.11.5.4	PC1-11503	Support in part with amendment and oppose in part	<p>The amendments to the wording of the provision are supported for the reasons set out in PC1-11485.</p> <p>Fish and Game supports deletion of the 75th percentile rule when replaced with a rule which phases our over-allocation, where allocation is based on an instream load consistent with ecosystem health. Phasing out overallocation by 50% by 2047 is supported, however this should be a maximum timeframe for</p>	<p>DISALLOW deletion of 75th percentile rule UNLESS replaced with a rule which phases out overallocation based on desired in-stream loads consistent with ecosystem health.</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>subcatchments to comply with.</p> <p>Fish and Game relies on the reasons above in PC1-13158 in relation to recognition of existing biodiversity values on private land.</p> <p>Fish and Game supports the remaining amendments set out in the submission as consistent with the above approach laid out in 'General' and 'Policy 1' submissions subject to reasons set out for Schedule 1 and Schedule C below, and the reasons in relation to Policies 12 and 13 under PC1-1275.</p> <p>Fish and Game considers consents of an extended term should not be included unless a trajectory of change capable of meeting targets and limits set to achieve ecosystem health is entered into over the course of that term; consents should be consistent with the timeframe to phase out overallocation and sustainable management under the RMA.</p>	<p>ALLOW amendments sought subject to:</p> <ul style="list-style-type: none"> • Amendments to Schedules 1 and C, and Policies 12 and 13 sought by Fish and Game; • Recognising only the biodiversity values which relate to in-stream contaminant loads or freshwater ecosystem health; • Long terms being enabled only where the term is consistent with timeframes to phase out overallocation and sustainable management.
3.11.5.6	PC1-11504	Oppose in part and Support with amendment	<p>Fish and Game opposes the amendment to i "<i>Cumulative effects on water quality of the catchment of the Waikato and Waipa Rivers in the relevant sub-catchment(s)</i>" and considers both the original and the added text should be included to ensure integrated management.</p> <p>Fish and Game supports the addition discretion over of a-f, however relies on the reasons above under PC1-13158 in relation to biodiversity enhancement.</p> <p>Fish and Game supports the remaining amendments set out in the submission as consistent with the above approach laid out in 'General' and 'Policy 1'</p>	<p>DISALLOW removal of text in i, and instead amend to read: <i>Cumulative effects on water quality of the catchment of the Waikato and Waipa Rivers and in the relevant sub-catchment(s)</i>.</p> <p>ALLOW remaining amendments SUBJECT TO:</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			submissions subject to the reasons in relation to Policies 12 and 13 under PC1-1275	<ul style="list-style-type: none"> • Amendments to Policies 12 and 13 sought by Fish and Game; • Recognising only the biodiversity values which relate to in-stream contaminant loads or freshwater ecosystem health.
3.11.5.7	PC1-11505	Support	The amendments are consistent with sustainable management under the RMA and are efficient and effective. In order to give effect to the Vision and Strategy they must be implemented as part of an allocation regime which progressively removes overallocation down to a level based on in-stream ecosystem health.	ALLOW amendments SUBJECT TO their implementation as part of an allocation regime which progressively removes overallocation down to a level based on in-stream ecosystem health
Schedule B	PC1-11506	Supports	All amendments sought improve Schedule B in accurately deriving estimates for operators and accounting for on-farm actions. The reference to the highest financial years for NRP gives more meaningful direction to users.	ALLOW
Schedule C	PC1-11507	Support in part and oppose in part	<p>Flexible stock exclusion and mitigation options should be available for farms of over 15 degrees for the reasons under PC1-12577. However, amendment to the clear statement of the intent to progressively exclude livestock (excluding sheep) from waterbodies listed is opposed. Any flexibility in the application of this is better housed in the Rule and FEP provisions and must include:</p> <ul style="list-style-type: none"> • Only applicable where the farms are also low intensity; • Clear definitions for low intensity, and "break fed"; • Higher standards and more prescriptive provisions in relation to some sensitive waterbodies and downstream environments (wetlands and 	<p>DISALLOW amendment to exclude land over 15 degrees and include only break feeding over 15 degrees.</p> <p>ALLOW exception for occasionally driving stock across waterbodies provided the exception clearly defines</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>Whangamrino Wetland complex).</p> <p>Fish and Game would require additional focus on larger setback distances and buffering between livestock and waterways, and a greater focus on intermittent and ephemeral waterways as part of mitigating the effects of stock on waterways at all slopes.</p> <p>Exception for occasionally actively driving stock across waterbodies is a reasonable exception with limited risk, but there should be specificity around eligible waterbodies (for example, not a significant wetland) and choosing a relatively lower risk location.</p>	<p>the low risk circumstances under which the rule applies, including:</p> <ul style="list-style-type: none"> • Excluding sensitive waterbodies; • A limit on frequency; • A requirement for this to occur at an appropriate location.
Schedule 1	PC1-12366	Oppose in part	Fish and Game oppose referring to key critical source areas only as this term is not defined and the factors listed under 2 are not exclusive.	DISALLOW
Schedule 1	PC1-12367	Support	The amendment assists in the workability of FEPS.	ALLOW
Schedule 1	PC1-12364	Support with amendment	Fish and Game supports flexible stock exclusion and mitigation options for farms of over 15 degrees for the reasons under PC1-1257 and the reasons set out in the Fish and Game submission p40, however only supports the amendments for low intensity activities only, and requires increased mitigations for cultivation on steeper slopes.	<p>ALLOW, amendments SUBJECT TO:</p> <ul style="list-style-type: none"> • 2a(ii): stream-fencing the <u>water body</u>; • that ensure grazing without fencing does not occur for high intensity activities (eg break feeding) over 15 degrees; • Applying larger buffers for cultivation on all slopes per the buffer schedule in Schedule D of Fish and Game’s submission.



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Schedule 1	PC1-12365	Support with amendment	Fish and Game supports the amendments as it gives effect to the other amendments to provisions sought for allocating Nitrogen within environmental limits (provided these are set to achieve ecosystem health), and for the reasons set out above PC1-11485. Flexibility up to the sustainable level is supported provided this is defined and does not contribute to the in-stream load, or result in further instream degradation as determined by science and applying a precautionary approach.	ALLOW amendment to enable land use flexibility up to the sustainable level PROVIDED this is defined and does not contribute to the in-stream load, or result in further instream degradation as determined by science and applying a precautionary approach.
Schedule 1	PC1-11508	Support in part with amendment and oppose in part	Fish and Game supports the amendments proposed in part as supporting farmers in their Farm Environment Planning and the actions and mitigations included therein. BPO should only be included as an option where a more specific mitigation or action is not already prescribed. In relation to CFEPs, Fish and Game rely on the reasons under PC1-11496.	DISALLOW removal of CFEPs. DISALLOW availability of BPO where more specific actions or mitigations are prescribed. Otherwise ALLOW.
Table 3.11-1	PC1-11158	Support in part with amendment and oppose in part	Fish and Game opposes the amendments to the EColi standards sought for the inclusion of various ranges dependant on time and flow as the use of the 95 th percentile accounts for any variability across the range of data. Limits and Targets for Clarity should be based on means derived from the full range of monitoring data to give effect to the Vision and Strategy. Further, Fish and Game does not agree that the risk for contact recreation directs that these parameters should not apply during high flow events, as these events can be times of contact recreation for non-swimming sports, including gamebird hunting. In relation to the other amendments sought, Fish and Game relies on its reasons above in PC1-11146, PC1-11154, PC13156, PC1-11482, PC1-11485.	DISALLOW amendments to EColi and clarity parameters and ensure attributes represent the full range of monitoring data. ALLOW amendments sought subject to refinement of Values and Objectives giving effect to the Vision and Strategy and NPSFM.



Statutory managers of freshwater sports fish, gamebirds and their habitats.

				<p>DISALLOW amendments which reformulate Freshwater Objectives UNLESS these reflect the swimmable, ecosystem health and food gathering goals and give effect to the Vision and Strategy and NPSFM.</p> <p>ALLOW amendment to timeframes and quantum of change SUBJECT TO targets and timeframes must entering into a trajectory of improvement capable of meeting 80 year target as adjusted to meet the healthy, swimmable and mahinga kai goals of the plan change and giving effect to the Vision and Strategy.</p> <p>ALLOW amendment to set out loads and discharge rates as set out in a), b), c) and d) SUBJECT TO the desired in-stream loads being sufficient to achieve in-stream concentration limits and targets set in Table 3.11-1 to achieve the swimming,</p>
--	--	--	--	---



Statutory managers of freshwater sports fish, gamebirds and their habitats.

				<p>mahinga kai, and ecological health goals of PPC1, the Objectives of the Plan, and give effect to the Vision and Strategy and the NPS, and ENSURE MAZL achieves desired loads and concentrations in-stream and is subject to refinement and review over time.</p> <p>DISALLOW water quality outcomes below limits caused by significant infrastructure.</p>
Definition – Stock unit	PC1-11509	Support	The approach supports consistency across types of operations and promotes accurately deriving estimates for operators and accounting for on-farm actions.	ALLOW
Glossary of Terms	PC1-11510	Support with amendment	<p>Fish and Game seeks that amendments made to the ‘Critical Source Area’ be consistent with accepted scientific understanding of that term.</p> <p>Fish and Game seeks that amendments to the term ‘Best Practicable Option’ be consistent for Point and Non-point sources and with excising legal definitions of that term.</p>	ALLOW with amendments AND ENSURE consistency with science, law and existing planning documents.

CNI Iwi Land Management Limited *Submitter ID: 74026*

Address of Original Submitter: bridget@eland.co.nz c/o Bridget Robson, 21 Carling Road, Whakatane 3120

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
--------------	---------------------	------------------------------	---	-------------------------------------



Statutory managers of freshwater sports fish, gamebirds and their habitats.

3.11.4.2	PC1-10786	Support with amendment	Fish and Game opposes the inclusion of Certified Industry Schemes for the reasons set out in pp 35-36 of its submission, however the amendments proposed improve accountability and should be included if the schemes are relied upon.	ALLOW the amendments IF CISs retained.
Schedule 2	PC1-10808	Support with amendment	Reasons above under PC1-10786.	ALLOW the amendments IF CISs retained.
Table 3.11-1	PC1-10772	Support in part and oppose	Fish and Game agrees that 10-year Nitrogen targets should reflect a reduction framework based on necessary reductions rather than current loads, however otherwise opposes the amendments to the Table as they do not appropriately characterise ecosystem health in all subcatchments. Interim targets which reflect the amount of reduction necessary are needed to meet long term targets	ALLOW targets that reflect a reduction framework based on necessary reductions rather than current loads AND otherwise DISALLOW.

DairyNZ Submitter ID: 74050

Address of Original Submitter: Justine.young@dairynz.co.nz corner Ruakura & Morrinsville Roads, Newstead, Private Bag 3221, Hamilton 3240

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Full achievement of the Vision and Strategy will be intergenerational	PC1-10164	Support with amendment	Overall, Fish and Game supports retaining the provisions subject to amendment to provide clarity and signals to land users as to the changes that will be required of them to achieve the Vision and Strategy in the time frame laid out by PPC1. The submitter seeks sector neutral language: on farm land based actions ". This amendment is supported by Fish and Game as it recognises that contribution will be required from all sectors.	Retain the provision SUBJECT TO amendment to provide clarity and signals to land users as to the changes that will be required of them to achieve the Vision and Strategy in the time frame laid out by PPC1.
Objective 3	PC1-10168	Support in part with amendment and oppose in part	The submitter seeks amendment to specify 10% and remove the reference to 'short term'. Fish and Game considers both term and quantum of improvement should be specified to ensure a trajectory of change capable of achieving the 80 year Objectives of the plan is entered into.	ALLOW amendments that specify current state as at 2016. DISALLOW amendment to term



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>Fish and Game supports the submission to specify the current water quality as that at 2016.</p> <p>The submitter seeks amendment to insert <i>for each monitoring site listed in Table 3.11-1</i>; Fish and Game opposes the submission as the Objective should apply to all sub catchments, including those without current monitoring sites and additional sites which are monitored (including Pungarehu Canal).</p>	<p>and include a term/timeframe for this to be achieved;</p> <p>DISALLOW amendment to insert “for each monitoring site listed” UNLESS there is amendment to ensure all subcatchments are represented in Table 3.11-1, and there is monitoring in each subcatchment, including an additional Pungarehu Canal site.</p>
Objective 4	PC1-10193	Support with amendment	<p>Fish and Game support amendment to Objective 4 to assist community resilience and considers this required amendment would reduce uncertainty around further contaminant reductions and action required by landowners by giving a clearer signal of how change will be required, however the amendment proposed is not sufficient to achieve this.</p>	<p>DISALLOW amendment and make further amendment to reduce uncertainty around further contaminant reductions and action required by landowners by giving a clearer signal of the change required.</p>
Reasons for adopting Objective 3	PC1-10189	Support with amendment	<p>Fish and Game supports the amendment of goals<u>targets</u> subject to the addition of “<u>limits</u>”. This is consistent with the NPS FM.</p>	<p>ALLOW amendment to include ‘targets’ SUBJECT TO including ‘targets and limits’.</p>
Policy 1	PC1-10196	Support in part with amendment and oppose in part	<p>The submitter seeks amendment so that Policy 1 applies to point source discharges. Amendments to Policies 12 and 13 sought by Fish and Game are consistent with the approach.</p> <p>The submitter seeks amendment to <i>a. Enabling activities with a low level or</i></p>	<p>ALLOW amendment to include point source discharges SUBJECT TO the amendments to Policies 12 and 13 sought by Fish and Game.</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p><i>managed low risk of contaminant discharge</i>. The change in wording supported as consistent with the intent.</p> <p>The submitter seeks amendment to <i>b</i>. The amendments do not accommodate the required reductions needed across all contaminants for farming activities for moderate to high discharges.</p>	DISALLOW amendment of Policy 1(b).
Policy 2	PC1-13741	Oppose in part and Support in part with amendment	<p>The amendment to a) is unnecessary and provides less clear guidance than the PPC1 wording and therefore opposes the amendment. The new clause e) <i>[it is not clear whether it is intended to replace the existing clause e) or as an additional clause, Fish and Game considers the latter is intended and responds to this]</i> provides some clarity to the role of FEPs however, the provisions i, ii, and ii should be amended to reflect an allocation framework for N which progressively phases out overallocation in those subcatchments which are overallocated.</p>	<p>DISALLOW amendment to a) of: <i>mitigation actions on the land that will reduce for diffuse discharges.</i></p> <p>ALLOW amendment to include an additional clause e), but DISALLOW inclusion of i, ii, iii or replace these with clauses that reflect an allocation framework for N which progressively phases out overallocation in those subcatchments which are overallocated AND definition of 'sub-catchment plans' and their goals.</p>
Policy 6	PC1-10230	Oppose	<p>The amendment sought by the applicant may provide an additional avenue by which consents will "generally" be approved/granted; in addition to clear and enduring decreases in contaminants, applications may generally be granted if they can show no increases (ie, are 'neutral'). Fish and Game does not support the wording as it does not provide appropriate guidance for landowners and plan users and does not achieve the Objectives of the Plan Change. Associated</p>	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			consents could be granted without proper consideration of the cumulative effects of such consents (consistent with Strategy 11 of the Vision and Strategy, and necessary under the RMA and to give effect to the Objectives of the Plan Change and the Vision and Strategy).	
Policy 7	PC1-10229	Oppose	<p>The amendments narrow the scope of Policy 7 to ‘information gathering’ rather than ‘preparing’ and removes necessary signals to the agricultural sector as to the trajectory and pace of change required to reach long term Objectives; the amendment is not supported as it does not enable the sector to prepare for the future and instead implies that short term reductions are based on current information available, rather than a staged approach over time, and that requiring any future reductions will be based solely on new information.</p> <p>The amendment is overly focussed on partnership with industry organisations which does not promote sustainable management and management within set limits. To give effect to the Vision and Strategy within the timeframe set, the plan change should signal to users to enable them to make decisions on investment. Removal of Policy 7(a-d) would remove these signals.</p>	DISALLOW
Policy 9	PC1-10237	Support in part with amendment and Oppose in part	<p>Sub catchment planning is set out in Method 3.11.4.5. The functions included there can help inform farmers but are not sufficient to show the whole picture of what may be required on a farm; the amendment should extend to all farming types (rather than just dairy), and also be further amended to reflect that subcatchment plans will “<i>help inform</i>”.</p> <p>The remaining amendments to Policy 9 are opposed in part. The amendment of additional clause e) should read “are achieved <i>and maintained</i>”. Fish and Game considers the amendment should be more appropriately addressed via re-wording c) to define what the encouragement would look like (ie, <i>encouraging, through the use of formal and enduring mechanisms, and/or funding assistance</i>).</p>	<p>DISALLOW amendment to link to subcatchment plans UNLESS this includes all farming types and clarification that subcatchment plans will <i>help inform what is required</i>.</p> <p>DISALLOW remaining amendments, OR AMMEND Policy 9 c) to read: <i>Encouraging cost-effective mitigations</i></p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			Method 3.11.4.5(g) covers utilising public funds to support edge of field mitigations; the Policy amendment to include funding assistance should explicitly link to this provision.	<i>where they have the biggest impact on improving water quality <u>including by using formal and enduring mechanisms and funding assistance as set out in Method 3.11.4.5(q).</u></i>
3.11.4 Implementation methods	PC1-10239	Support with amendments	The amendment should specify that the mitigations “ <u>reduce diffuse contaminants discharged to water</u> ”. Further amendment should be made to recognise the role of independent science: “ <i>Involving technical experts...from council, industry and independent scientific research organisations</i> ”. Fish and Game supports methods to enhance and implement edge of field mitigations where effective and efficient in affecting water quality improvements.	DISALLOW OR ALLOW with further amendment to state ‘ <u>reduce diffuse contaminants discharged to water</u> ’ and ‘ <u>and independent scientific research organisations</u> ’.
3.11.4.7 Information needs to support any future allocation	PC1-10240	Oppose in part and support in part	<p>The removal of text removes the clear signal that future allocation is intended; the removal of this signal is opposed, however, enterprise or property level limits may be based on an allocative framework.</p> <p>The amendment is overly focussed on partnership with industry organisations which does not promote sustainable management and management within set limits. To give effect to the Vision and Strategy within the timeframe set, the plan change should signal to users to enable them to make decisions on investment.</p> <p>Fish and Game considers singling out impoundment in hydro dams is overly specific and excludes other effects across the catchment of infrastructure which may be due to both spatial and temporal factors.</p>	<p>DISALLOW amendments sought except for additional iv.</p> <p>DISALLOW amendment to add iv, UNLESS amended as follows: iv: <u>How spatial and temporal variability in how land use and mitigations and nationally significant infrastructure the effect of impounded water in hydro-dams affect water quality at a variety of scales, to analyse where mitigation can be put in place for the least cost to the regional community and</u></p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

				<i>to the benefit of all values.</i>
3.11.4.8 Reviewing chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-10241	Oppose	The amendment sought removes necessary signals to the agricultural sector as to the trajectory and pace of change required to reach long term Objectives; the amendment does not enable the sector to prepare for the future and make decisions on investment. It instead implies that continued short term reductions are sufficient over successive plans, rather than a planned approach to reduce overallocation over time. The amendment removes the clear signal that allocation is necessary and intended to continue the trajectory of improvement required to achieve the long term outcomes required.	DISALLOW
3.11.4.10 Accounting System and monitoring	PC1-10242	Oppose	The submitter seeks to remove the accounting system as it relates to individual properties and enterprises and expand the resolution of accounting to FMU scale. Accounting should occur at the resolution at which consents are granted to support compliance with those consents. The amendment is opposed as it does not ensure the consenting framework will be robust, reliable and transparent.	DISALLOW
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-10243	Support in part with amendment	<p>The change to the heading of the method is opposed as none of the substantive changes relate to an accounting system for land activities that affect water. The change to a)i) relates to current and expected future loads and therefore is not an “accounting system” for the actual land activities undertaken under PC1. The original heading should be retained.</p> <p>Fish and Game agrees as indicated in a.i) that setting out the current contaminant loads, and the expected contaminant loads as a result of mitigations assists monitoring and evaluation, however, this should specify where the load is to occur (ie, in-stream) include timeframes for the expected loads to be achieved. These loads should be set out against desired in-stream loads to determine overallocation, and an accounting system included to ensure that loads expected as a result of mitigations are achieved within the required timeframes. Due to the inherent uncertainty as to the efficacy of mitigations, the precautionary principle</p>	<p>DISALLOW change to heading and retain original heading.</p> <p>ALLOW new method a.i. SUBJECT TO adding: <i>current contaminant <u>in-stream</u> loads ...and expected future <u>in-stream</u> loads <u>at specified dates...after mitigation actions are put in place and implemented, and desired in-stream loads, and whether the sub-catchment is overallocated, and if so, the amount of</u></i></p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>should be applied in reducing overallocation over time.</p> <p>Amendments proposed to b) support actioning methods rather than simply identifying them is supported.</p> <p>Fish and Game does not consider that the Council should be working in partnership with industry to monitor and evaluate plan implementation, however agrees that industry input is important to evaluate functionality and success of methods. The amendment to e) should therefore stand alone as a new method.</p>	<p><u>overallocation to be phased out, having regard to the expected in-stream load while applying the precautionary principle.</u></p> <p>AND include an accounting system to ensure mitigations projected are implemented, enduring and the loads expected are realised.</p> <p>ALLOW amendment to b).</p> <p>DISALLOW amendment to e).</p>
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-10244	Oppose	<p>Fish and Game oppose the removal of reference to best management practice and best practice guideline as it does not add clarity. Fish and Game agrees that GMP and BMP mean different things to different people, but considers the term is clarified in the definition. The role of BMP along with its relationship to GMP under Policy 1 and the nature of the measures under Schedule 1 should be set out more clearly. “<i>Work with primary industry</i>” is unnecessary as this is already implicit in b and limits the scope of support the Council can provide for outside of working primary industry.</p>	<p>DISALLOW, and clarify the role of BMP in relation to GMP under Policy 1 and Schedule 1.</p>
3.11.5.7 Non-complying activity rule – Land Use Change	PC1-10247	Oppose	<p>Fish and Game relies on the reasons set out above in PC1-10230.</p>	<p>DISALLOW</p>
Schedule B	PC1-10254	Support	<p>The amendment is supported as it improves how updates to OVERSEER will be addressed.</p>	<p>ALLOW</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Schedule 1	PC1-12391	Support with amendment	Fish and Game supports that FEPs allow alternative mitigations, but considers that this is already clear within the FEP framework, and that different standards have different requirements in relation to alternatives. Some measures explicitly enable alternatives, whereas others provide for specified alternative options. The amendment sought will make the range of actions available to an FEP drafter/user less clear.	DISALLOW
Schedule 1	PC1-10255	Oppose	Fish and Game opposes the amendment of <i>“the FEP shall identify all <u>critical source areas</u> sources of sediment, nitrogen</i> . Reductions should occur from all “sources” of contaminants when viewed across an enterprise or property, by applying the FEP rather than only the “critical source areas”. Explicit provisions for critical source areas is made elsewhere in Schedule 1.	DISALLOW
Table 3.11-1	PC1-10188	Oppose	<p>The amendment to paragraph 4 is incorrect and opposed; there is not currently a monitoring site within each sub-catchment, however, Fish and Game supports amendment of the Table so that each sub catchment is represented, and Pungarehu Canal is included.</p> <p>Fish and Game further opposes the amendment because it appears to suggest that all sub catchments end at the downstream confluence of a tributary to/with the Waikato or Waipa River. Some subcatchments do not (Map 3.11-2). Fish and Game considers it unhelpful to state that <i>“therefore WRC will rely on collating and reporting actions put in place, as set in Policy 1(d), and Methods in 3.11.4.10 and 11”</i> as this confuses instream monitoring used to determine the achievement of attribute targets as set out in paragraph 4 with the monitoring of actions required under the PPC1 (already included in the policies and methods referred to); the amendment suggests the latter may be relied on instead of the former to determine achievement of attribute targets. Despite limitations listed in Paragraph 4, instream monitoring should still be recognised as essential in determining the achievement of the attribute targets and as the only method of</p>	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			measuring the efficacy of actions.	
Definition – 75 th percentile nitrogen leaching value	PC1-10253	Support	The amendment is more workable for plan users and less ambiguous and therefore supported.	ALLOW
Definition – Certified Farm Environment Planner	PC1-10250	Support in part	The amendment ensures CFEPs have the requisite skills to certify FEPs, but is meaningless without appropriate guidance for CFEPs certifying the plans.	DISALLOW
Definition – Certified Farm Nutrient Advisor	PC1-10251	Oppose	Fish and Game considers the existing definition of CFNA to be sufficient to determine the amount of nitrogen being leached from a property or enterprise during the relevant period according to the protocols set out in the plan.	DISALLOW
Definition - Setback	PC1-10249	Support	The amendment so that the setback is from the “ bed-top of the bank ” is more workable by plan users, less ambiguous and promotes a uniform approach therefore supported.	ALLOW

Department of Conservation *Original Submitter ID: 71759*

Address: [Gwhite@doc.govt.nz](mailto:gwhite@doc.govt.nz) Gemma White, Statutory Manager (Hauraki-Waikato-Taranaki), Director General of Conservation, Private Bag 3172, Hamilton 3240

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
General	PC1-13150	Support	<p>The submitter seeks that policy 15 and 15(a) be amended Fish and Game supports the submission for the reasons set out in pp13-14 of its Variation 1 submission.</p> <p>Fish and Game considers Catchment Management Plans as an additional tool which should be utilised in support of more specific and defined methods for restoration and protection of the Whangamarino Wetland and therefore considers it is appropriately included as an additional method.</p>	ALLOW amendments sought



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>Fish and Game supports the new methods to achieve the targets for the proposed Whangamarino Wetland FMU which provide clear guidance for implementation actions which have already been identified to occur, for the reasons in p15, Fish and Game Variation 1 submission.</p> <p>New objectives, policies and methods to appropriately provide for natural character values promote sustainable management.</p> <p>Amendments to recognise the significance of those individual lakes, wetlands and rivers of regional, national or international significance that have high biodiversity/conservation values promotes sustainable management.</p>	
General	PC1-8090	Support	<p>The approach outlined promotes sustainable management and is consistent with the NPSFM.</p> <p>Greater changes to the management regime of contaminant discharges in the short-term through an allocation regime which recognises land type and achieves a greater short term improvement in water quality is supported for the reasons in pp14-15 of Fish and Game’s submission.</p> <p>The submitter seeks for all FMUs, amendment to provide for an allocation regime that only permits the discharge of contaminants up to a level that ensures the limits and objectives for the FMU can be achieved. The submitter seeks that where there is exceedance of limits, necessary targets should be set along with necessary implementation methods. This framework is supported for the reasons in pp14-15 of Fish and Game’s submission.</p> <p>The submitter seeks specified characteristics be included in the allocation regime sought: Allocation according to natural characteristics of the land as outlined by the Submitter, is the most appropriate, efficient and effective means of achieving the objectives of the proposal and amendments to objectives sought, and will deliver greater changes to the management regime of contaminants in the short</p>	<p>ALLOW the amendments as set out in the diagram under point 36 of the submission.</p> <p>ALLOW the amendments to deliver greater changes to management of contaminant discharges and greater short term improvements through the use of an allocation regime that recognises land type.</p> <p>ALLOW the amendment of PPC1 to establish an inefficient allocation regime which:</p> <ul style="list-style-type: none"> ○ States the maximum catchment load of contaminants; ○ Allocates the maximum catchment load among land users using an approach whereby land type



Statutory managers of freshwater sports fish, gamebirds and their habitats.

		<p>term as described by the submitter. This approach is consistent with Fish and Game’s submission, the RMA, NPS-FW the Vision and Strategy, and the RPS.</p> <p>The Waikato Delta (which includes part of the Waikato Estuary) is a site of Regional Significance under the Auckland/ Waikato Sports Fish and Game Bird Management Plan. The gamebird resource in this site has incurred a significant reduction and improvement to this habitat are necessary to maintain this significant resource.</p> <p>Fish and Game supports amendments to protect the significant values of wetlands for the reasons set out in pp19-20 of its submission.</p> <p>The submitter seeks adoption of lake attributes as specified in Appendix I Tables A and B. The approach promotes sustainable management.</p> <p>The submitter seeks prioritisation of lakes for action. Appendix H includes lakes of Local and Recreational Significance under the Auckland Waikato Sports Fish and Game Bird Management Plan¹ and all are included in the Waikato Regional Council Shallow Lakes Management Plan which summarises available information and knowledge for shallow lakes in the Waikato Region and identifies management actions for individual lakes. These lakes provide important values including habitat for game birds and sports fish; prioritisation of management is efficient and effective in achieving restoration and protection by reducing the risk of further degradation. Sufficient information is available to support prioritisation.</p> <p>The submitter seeks attributes, limits and methods for sediment, temperature, dissolved oxygen and MCI. These enable an accurate characterisation of water quality and ecosystem health and enable assessment of the effectiveness of PC1</p>	<p>including slope, soil type, drainage and geology is the key determinant;</p> <ul style="list-style-type: none"> ○ Seeks to ensure that activities which would cause maximum catchment load to be exceeded are avoided; ○ Seeks to ensure that in catchments that are already over allocated, PPC1 establishes methods to phase out over-allocation over time. <p>ALLOW amendment to ensure a reduction in the turbidity of the Waikato Estuary.</p> <p>ALLOW amendment to include ongoing monitoring and adaptive management of turbidity in the Waikato Estuary.</p> <p>ALLOW amendment to protect the significant values of wetlands as described.</p> <p>ALLOW amendments to lake attributes and targets as set out In Appendix I, and prioritisation of lakes for action as set</p>
--	--	--	--

¹ Lake Parkinson, Lake Rotomānuka, Lake Rotoroa, Rotopiko/Serpentine Lakes, Lake Waahi.



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>and progress towards restoration and protection and giving effect to the Vision and Strategy and the NPS-FW, and the objectives of the Plan Change.</p> <p>The submitter seeks 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 are included. This is supported and necessary to give effect to the NPS-FW and the Vision and Strategy and realise the Objectives of the PC1.</p>	<p>out in Appendix H.</p> <p>ALLOW amendment to include attributes, limits and methods for sediment, temperature, dissolved oxygen and MCI.</p> <p>ALLOW amendment to include 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.</p>
3.11 Waikato and Waipā River Catchments	PC1- 10465	Support	The submitter seeks amendment to map scale and inclusion of FMUs for each individual lake and its catchment and recognition of existing lake management work and planning. The amendment promotes sustainable management, is consistent with the NPS-FW, and is effective and efficient.	ALLOW
3.11 Waikato and Waipā River Catchments, showing Freshwater Management Units	PC1-10504	Support	Reasons listed under PC1- 10465 above.	ALLOW
3.11.1 Values and uses for the Waikato and Waipā Rivers	PC1-8131	Support	Identifying values for each FMU is supported as it is consistent with the requirements of NPS-FW and RMA.	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Intrinsic values - History	PC1-8136	Support	Inclusion of relationship of River Iwi with lakes, wetlands and the coastal environment is consistent with the Vision and Strategy and the NPS-FW.	ALLOW
Intrinsic values – Ecosystem health	PC1-8139	Support	<p>The submitter seeks amendment to expand the broadly defined Ecosystem Health value to provide for ecosystem health, ecosystem processes and biological diversity at specific locations. Fish and Game supports this submission as the value depends on the natural processes and habitats which occur within a specific type of ecosystem, and should have particular regard to the intrinsic values of ecosystems.</p> <p>The submitter has identified that at a minimum, the value should recognise inanga spawning, native fish migration, biodiversity hotspots and threatened and at-risk species. Fish and Game supports recognition of these factors at a minimum and considers it should include avian biodiversity and abundance, trout spawning, trout populations and migration as set out in the Fish and Game submissions; these values should be recognised for different locations or water bodies. The relief sought is consistent with Policies 8.1, 8.2 and 8.3 RPS.</p> <p>The applicant seeks amendment to the 4th bullet point- this is supported for the reasons in p8(3.a.) Fish and Game Variation 1 submission.</p> <p>The submitter seeks the addition of the specified bullet points. All are consistent with accurately defining ecosystem health values in the catchment and are supported by Fish and Game, as they are needed to give effect to the NPS-FM, RPS and the RMA.</p>	ALLOW
Intrinsic values – Natural form and Character	PC1-8152	Support	The submitter seeks this include lakes, wetlands and the coastal environment. This approach is consistent with the Vision and Strategy NPS-FW and the RPS. This is consistent with Fish and Game’s submission that wetlands be included.	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			The submitter seeks inclusion of a list of characteristics of the intrinsic value. Fish and Game supports this expansion of the value to include a broader array of factors which relate to this value than the narrow and non-representative few river-related values proposed.	
Use values – Wai tapu	PC1-8532	Support	Reasons listed under PC1-8152 above.	ALLOW
Use values – Mahinga kai	PC1-8533	Support	Reasons listed under PC1-8152 above.	ALLOW
Use values – Human health for recreation	PC1-8535	Support	Reasons listed under PC1-8152 above.	ALLOW
Use values – transport and Tauranga waka	PC1-8540	Support	Reasons listed under PC1-8152 above.	ALLOW
3.11.2 Objectives	PC1-10521	Support	<p>The approach sought is promotes sustainable management, is consistent with the NPS-FW and RPS.</p> <p>The submitter seeks a new objective relating to the Whangamarino Wetland and the significant values of all wetlands. The submission is supported as necessary for protection and restoration of Whangamarino Wetland and wetlands in the Waikato catchments for the reasons at pp19-20 Fish and Game submission.</p> <p>The submitter seeks amendment to recognise that all sediments and nutrients in the region ultimately accumulate in the Waikato Estuary, and seeks restoration of healthy ecosystems from the mountains to the sea, including in estuaries. This recognises the heightened sensitivity, significance and pressure non the Waikato Estuary and addresses these in a manner consistent with the NPS FM, integrated management, the NZCPS and the RPS.</p>	ALLOW
Objective 1	PC1-10535	Support	The amendment gives effect to the Vision and Strategy, and addresses an	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			imbalance that exists within PPC1 whereby primary production is the focus as opposed to other relevant activities and values that the water bodies and water quality hold and provide. Fish and Game support the positive focus on water quality restoration and protection to this end.	
Objective 2	PC1-10537	Support	<p>The amendment to recognise the benefits to the environment from the restoration and protection of water quality is supported for the reasons above under PC1-10535.</p> <p>Deletion of the word 'continue' is supported for the reasons given by the submitter and because it promotes sustainable management by ensuring resources are managed in a way or at a rate which enables people and their communities to provide for their social, economic and cultural wellbeing.</p>	ALLOW
Objective 3	PC1-10540	Support	<p>The submission is supported for the reasons at p30 of Fish and Game's submission and because it gives effect to the NPS FW and the Vision and Strategy.</p> <p>The submitter seeks amendment to that point source discharges are included; managing all inputs equitably promotes sustainable management and is consistent with the RPS 8.3.1.</p>	ALLOW
Objective 4	PC1-10542	Support	The submitter seeks amendments which promote sustainable management and are consistent with giving effect to the Vision and Strategy and NPS FM.	ALLOW
Objective 5	PC1-10545	Support	Amendment to clause b to clarify that the intrinsic values are not considered 'impediments' is consistent with promoting sustainable management and is supported.	ALLOW
3.11.3 Policies	PC1-10639	Support	New policies (and rules) to protect inanga spawning habitat are supported as representing ecosystem health and the habitat values of sportfish and gamebirds.	ALLOW
Policy 1	PC1 -10643	Support	The changes provide requisite clarity and promote sustainable management.	ALLOW
Policy 2	PC1-10646	Support	Reason listed under PC1-10643 above.	ALLOW
Policy 3	PC1-10653	Support	Reason listed under PC1-10643 above. The amendments are supported as	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			promoting sustainable management and for the reasons in pp13-15 of Fish and Game's submission.	
Policy 4	PC1-10655	Support	The amendments sought provide certainty and direction required for effective and efficient operation of the Plan.	ALLOW
Policy 6	PC1-10664	Support	Fish and Game supports the requirement for clearer direction for decision makers, or the alternative proposed, and considers this necessary for the reasons in pp12-13 of its submission on Variation 1.	ALLOW either of the amendments sought, OR the amendments sought to Policy 6 at pp12-13 of Fish and Game's Variation 1 submission.
Policy 7	PC1-10667	Support	Fish and Game supports the amendments for the reasons at 29-30 of its submission and as improvements necessary for operational effectiveness and efficiency of the Plan.	ALLOW
Policy 8	PC1-10670	Support	<p>The submitter seeks prioritised implementation with all wetland at lakes sub catchments included as Priority 1 in Table 3.11-2. Lakes and wetlands constitute significant and valuable habitat and recreational resources for sportfish and gamebirds. The Whangamarino wetland is of particularly high significance. In addition, Fish and Game has invested in significant works and restoration projects for lakes and wetlands in the catchment. Lakes and wetlands in Priority 3 catchments, of which there are many in the best condition, are the most vulnerable to deterioration.</p> <p>Appendix H of the submission includes several lakes of high local and regional recreational significance to anglers and hunters as identified by the Auckland/Waikato Sports fish and Game Bird Management Plan (ie: Lake Parkinson; Lake Rotomānuka; Lake Rotoroa [Regional significance]; Lake Rotopiko (Serpentine); Lake Waahi [Regional significance]).</p> <p>Prioritisation facilities positive outcomes in lakes where there has already been significant investment. Examples pertinent to Fish and Game and included in the Auckland/Waikato Sports Fish and Game Bird Management Plan are: Rotopiko</p>	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			(Serpentine) Lakes; Lake Ngaroto; Lake Tunawhakaheke (Lake E), where Farm Environment Plans have already been prepared for these catchments. Substantial investments have already been made for restoration planning of many lakes in the catchment, of these, Lakes Are Are, Ngaroto and Waahi are of high recreational significance to Fish and Game.	
Policy 9	PC1-10671	Support	Fish and Game supports amendments as improvements required for the operational effectiveness and efficiency of the Plan.	ALLOW
Policy 10	PC1-10676	Support in part	The amendments are supported by Fish and Game as consistent with the requirements of the RMS and for the reasons on pp 30-34 of its submission.	ALLOW
Policy 11	PC1-10694	Support	The amendments are supported by Fish and Game as consistent with the requirements of the RMS and for the reasons on pp 30-34 of its submission.	ALLOW
Policy 12	PC1-10738	Support	The submitter seeks to retain the Policy in the absence of a more appropriate allocation regime. Fish and Game supports retaining the policy in the absence of a more appropriate allocation regime, but on a broad level supports that there should be explicit considerations listed for point source discharges for the reasons on pp 30-34 of its submission.	ALLOW
Policy 13	PC1-10739	Support	A common catchment expiry date rather than a blanket 25 year term enables effective, efficient and sustainable management.	ALLOW
Policy 14	PC1-10742	Support	Further delay on managing degraded lake systems does not give effect to the Vision and Strategy or promote sustainable management. If this action is delayed, further degradation from which it will be difficult and costly to recover, is likely to occur during the operation of this Plan. Amendment promotes expediency and sustainable management.	ALLOW
Policy 16	PC1-10745	Support	Amendment to include a land based allocation regime is supported as necessary for effective, efficient and enduring improvements.	ALLOW
Policy 17	PC-10746	Support	The submission is supported as consistent with the overarching policy and legislative documents listed. Removing the wording 'secondary benefit' submission is supported for the reasons at p35 Fish and Game submission.	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

3.11.4	PC1-10633	General Support	The new methods proposed recognise the heightened sensitivity, significance and pressure on both the Whangamarino Wetland complex. They are also necessary for to promote sustainable management. All remnant wetlands in the Waikato catchment are significant.	ALLOW amendment to include all new methods sought.
3.11.4.3	PC1-10752	Support	Fish and Game agrees greater emphasis on the overall goal of FEPs in the provision would provide clarity and enhance the workability of the Plan.	ALLOW
3.11.4.4	PC1-10753	Support	The Waikato Shallow Lakes Management Plan already contains actions that can be prioritised. Further delaying action on these systems does not give effect to the Vision and Strategy or promote sustainable management. The amendments are supported for the reasons in pp14-15 Fish and Game Variation 1 submission.	ALLOW
3.11.4.5	PC1-10759	Support	The amendments support the efficiency and effectiveness of the operation of the Plan and are consistent with the requirements of the Vision and Strategy and the RMA.	ALLOW
3.11.4.7	PC12-10764	Support	The submission is supported for the reasons under Fish and Game's proposed method 7A, pp37-38.	ALLOW
3.11.4.8	PC1-10765	Support	The submission is supported for the reasons at p38 Fish and Game submission.	ALLOW
3.11.4.10	PC1-10767	Support	The amendment accounts for the high significance but heightened vulnerability of wetlands and the urgency of measures to ensure there is no further loss. It accounts for and monitors ecosystem health accurately to ensure that values for water bodies (including those relevant to fish and game) can be maintained and life supporting capacity can be measured. The amendment recognises the importance of the Waikato Delta (a site of significance to Fish and Game) and ensures it is appropriately monitored as a receiving environment for contaminants from the throughout the catchment. The Waikato Delta includes an estuarine environment for which the life supporting capacity is impacted by contaminants entering from the Waikato catchment.	ALLOW
3.11.4.11	PC1-11052	Support	The submitter seeks amendment to make clear links between this method and	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			method 3.11.4.10. Review should be triggered by factors accounted and monitored in 3.11.4.10. The reporting schedule sought is supported by Fish and Game given the urgency of action in some water bodies in the catchment.	
3.11.4.12	PC1-11053	Support	Reasons stated in Fish and Game's submission.	ALLOW
3.11.5 Rules	PC1-11054	Support	<p>Fish and Game's relies on the reasons in C1 of its submission and the requirements of the RMA.</p> <p>The submitter seeks amendment to stock exclusion provisions. The amendments promote sustainable management.</p> <p>The submitter seeks to add an additional rule to protect inanga habitat. Fish and Game supports provision for values of these species which also represent the habitat values of trout and support trout populations.</p>	ALLOW
3.11.5.4	PC1-11057	Support	The submission is supported for the reasons in PC1-11054. Fish and Game agree clarification of the activity status is required.	ALLOW
3.11.5.6	PC1-11058	Support	Fish and Game relies on the reasons pp45-46 of its submission.	ALLOW
3.11.5.7	PC1-11059	Support with amendment	Support for reasons stated above under PC1-10664.	ALLOW either amendment sought OR amendment consistent with amendments sought sought to Policy 6 and Fish and Game's Variation 1 submission.
Schedule A	PC1-11060	Support	More robust information collection as specified is transparent and promotes sustainable management; the amendments support current or future allocation.	ALLOW
Schedule C	PC1-11055	Support	<p>Reasons stated under PC1-11054.</p> <p>Fish and Game agrees that Schedule C setbacks and fencing requirements are insufficient to address certain sources of contaminants (including overland flow) and that additional measures are required. The setbacks requested by to submitter promote sustainable management. Fish and Game considers that the buffering dependant on slope (and other erosion susceptibility determinants) goes some way to addressing the contaminant contribution of overland flow.</p>	<p>ALLOW amendment to schedule C</p> <p>ALLOW amendment to fencing requirements, AND include requirements for buffers.</p> <p>ALLOW amendment to rules.</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			Fish and Game considers changes will be required to rules to ensure that appropriate setbacks or buffers are applied for stock as well as cultivation.	
Schedule 1	PC1-12393	Support	<p>The Submitter seeks amendment to (2)(b)(iii) to require specified setbacks for cultivation from specified water bodies <i>[Note: in the Summary of Decisions, the wording use is “fencing setbacks”, however, the Submitters original submission does not refer to fencing in this context and requests a “setback for cultivation”; Fish and Game responds to the submitter’s original submission]</i>. Fish and Game supports the submission, as the minimum setbacks included are insufficient to promote sustainable management. Increased setbacks adjacent to peat lakes are required due to the risk to these systems posed by peat shrinkage.</p> <p>The submitter seeks amendment to Schedule 1 so that it requires setbacks for grazing and cultivation on sloping land to be evaluated in relation to soil type to ensure an appropriate distance is achieved. Fish and Game supports this approach and has sought an additional Schedule D of buffer requirements based on ESC classifications. Appropriate setbacks are necessary to ensure methods promote sustainable management.</p>	<p>ALLOW amendments sought to setbacks for cultivation.</p> <p>ALLOW armaments to require setbacks for grazing and cultivation on sloping land to be evaluated according to slope class AND APPLY the ESC system for buffers contained in Schedule D of Fish and Game’s submission (p64).</p>
Schedule 1	PC1-12394	Support	The submitter seeks amendment to Schedule 1. The amendments are supported as consistent with the healthy, swimmable and fishable goals of the plan and giving effect to the Vision and Strategy, and the NPS FM and promoting sustainable management.	ALLOW
Schedule 1	PC1-10647	Support	Fish and Game supports amendment so that Schedule 1 require FEPs to identify critical sources of Nitrogen and Phosphorous for lakes and of on-farm methods to reduce inputs of contaminants to lakes. This promotes sustainable management and is required to safeguard the life supporting capacity, restore and protect those systems. Steps to avoid, remedy, mitigate the extent and effects of existing drainage are supported as promoting sustainable management.	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

3.11.6	PC1-11061	Support	<p>The submitter seeks amendment to the Tables and Maps; the amendments are listed with reasons for Fish and Game’s support:</p> <ul style="list-style-type: none"> • Amend EColi Target; the amended target is consistent with NPSFM NOF standards and PPC1 goals for swimmability; • <i>[Fish and Game refer to Appendix B of the original submission which states that the submitter seeks that nitrate and toxicity limits be consistent with the desires for Ecosystem Health at each site and consistent across all attributes; this constitutes a change or amendment to the PPC1 rather than ‘further investigation’, which is also sought in Appendix B].</i> Fish and Game support the further investigation proposed as necessary for ensuring ecosystem health is targeted for at the appropriate level in particularly sensitive or significant sites. Fish and Game also support the amendments listed in Appendix B including interim changes to the proposed attributes which ensure that trophic state and toxicity attributes appropriately reflect ecosystem health and ensure the life supporting capacity of a waterbody at a site given the information available. • That the 10 and 80 year limits/targets are more ambitious and have a stronger emphasis on ecosystem health. Fish and Game supports the submission and agrees that more ambitious targets/limits are required to give effect to the Vision and Strategy and the NPS-FM as well as ensuring the life supporting capacity of water ecosystems is supported to meet the reasonably foreseeable needs of future generations. • Include interim 20 year targets to ensure future targets beyond the initial 10 year period that continue to work towards the 80 year long term targets. Fish and Game support interim targets provided that limits and targets enter into a trajectory of change foreseeably capable of meeting the long term targets/limits are included. Fish and Game consider there 	ALLOW
--------	-----------	---------	--	-------



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			to be a high risk that without clear interim targets/limits, an inequitable and unmanageable quantum of change will fall on future users.	
Table 3.11-1	PC1-10536	Support with amendment	<p>The submitter seeks to establish attributes, limits or targets for all contaminants specified in the Vision and Strategy for the whole of the Waipa catchment and all of the Waikato lakes, wetlands and the coastal environment. This gives effect to the Vision and Strategy, the NPS-FM and healthy, swimmable and fishable goals and objectives of PPC1.</p> <p>The inclusion of interim targets and the quantum and pace of change is supported by Fish and Game and is necessary to give effect to the Vision and Strateg and NPS FM.</p> <p>Fish and Game supports the submission on raised water quality targets for lakes as giving effect to the Vison and Strategy and the RPS, recognising that lakes are nutrient-sensitive fresh water bodies (8.4.3).</p> <p>Inclusion of Pungarehu Canal is supported to account for and manage the inputs for Whangamarino wetland and the Waikare sub-catchment.</p> <p>Targets for deposited and suspended sediment are supported as important determinants of ecosystem health, affecting processes within the water column and communities on the bed of waterbodies. Neither attribute is captured within the existing clarity attribute, which does not account for stream beds and is set at a state based on swimmability.</p> <p>The identification of values Waikato Delta, Whangamarino, Peat Lakes are (all of high significance to Fish and Game (AWFG Sportsfish and Gamebird Management Plan) should include Fish and Game values.</p>	ALLOW.



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>The submitter seeks to further investigate the water quality effects on ecosystem health; Fish and Game relies on all the reasons set out above under the second bullet point of PC1-11061.</p> <p>Fish and Game supports amendment to include attributes for a Whangamarino Wetlands FMU as necessary to restore and protect the wetland.</p>	
Table 3.11-2	PC1-11067	Support	<p>Reasons listed above in PC1-10670 (priority for lakes), PC1-10465 (immediate change required) and PC1-8090 (pace of change for lakes).</p> <p>Listing Pungarehu Canal as Priority 1 supported and consistent with Fish and Game's submission.</p> <p>Sub-catchment review to ensure holistic management of individual lakes through individual FMUS is consistent with the RMA, NPS FM and Vision and Strategy.</p>	ALLOW amendments sought.
Additions to Glossary of Terms	PC1-10658	Support	<p>The submitter seeks the inclusion of 'regionally significant industry' and 'low discharging activities'. Fish and Game considers further clarification of 'low discharging activities' would aid the workability of the Plan, and clarity is required as to the meaning of 'Regionally significant industry', so that users do not rely on terminologies appearing in non-regional planning documents. A definition consistent with the RPS and WRP should be relied upon which promote sustainable management.</p>	ALLOW amendments sought SUBJECT TO amendment to Policy 10 sought by Fish and Game.

Federated Farmers of New Zealand *Submitter ID: 74191*

Address of Original Submitter: nedwards@fedfarm.org.nz Nikki Edwards, Federated Farmers of New Zealand, PO Box 447, Hamilton 3240

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
General	PC1-10862	Oppose	The amendments as set out in the submission are not consistent with the requirement to give effect to the NPSFM or the WRPS, promote the sustainable	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			management of natural and physical resources, or give effect to the Vision and Strategy and the Objectives of PPC1. The amendments sought are not the most appropriate, efficient or effective way to achieve the objectives of PPC1.	
3.11.1	PC1-10810	Oppose	Fish and Game does not know what matters the submission is subject to and therefore cannot respond to the refinements referred to.	DISALLOW
Policy 1	PC1-10815	Oppose	Fish and Game does not know what matters the submission is subject to and therefore cannot respond to the refinements referred to.	DISALLOW
Policy 2	PC1-12754	Oppose	Fish and Game opposes the prescription of an “appropriate” term within the policies without consideration of the effects, including potential and cumulative, of the activity, including contaminants discharged, on the receiving environment, and including the matters set out for determining consent duration of point source consents at pp32-34 of the Fish and Game submission. Fish and Game does not know what matters the submission is subject to and therefore cannot respond to the refinements referred to.	DISALLOW
Policy 4	PC1-10820	Oppose	Fish and Game does not know what matters the submission is subject to and therefore cannot respond to the refinements referred to.	DISALLOW
Policy 5	PC1-10821	Oppose	Fish and Game does not know what matters the submission is subject to and therefore cannot respond to the refinements referred to.	DISALLOW
Policy 8	PC1-10825	Oppose	Fish and Game does not know what matters the submission is subject to and therefore cannot respond to the refinements referred to.	DISALLOW
Policy 9	PC1-10826	Oppose	Fish and Game does not know what matters the submission is subject to and therefore cannot respond to the refinements referred to.	DISALLOW
Policy 10	PC1-10827	Oppose	Fish and Game does not know what matters the submission is subject to and therefore cannot respond to the refinements referred to.	DISALLOW
Policy 11	PC1-10828	Oppose	Fish and Game does not know what matters the submission is subject to and therefore cannot respond to the refinements referred to.	DISALLOW
Policy 12	PC1-10829	Oppose	Fish and Game does not know what matters the submission is subject to and	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			therefore cannot respond to the refinements referred to.	
Policy 13	PC1-10830	Oppose	Fish and Game does not know what matters the submission is subject to and therefore cannot respond to the refinements referred to.	DISALLOW
Policy 14	PC1-10832	Oppose	Fish and Game does not know what matters the submission is subject to and therefore cannot respond to the refinements referred to.	DISALLOW
Methods 3.11.4	PC1-10838	Oppose	Fish and Game does not know what matters the submission is subject to and therefore cannot respond to the refinements referred to.	DISALLOW
3.11.5 Rules	PC1-10844	Oppose	<p>The submitter seeks a new rule to implement the Policy of providing an exemption from FEPS and CISs for those emitting less than 15kgN/ha. Fish and Game considers the additional Rule unnecessary as this scope is already covered by existing Rules and the reasons at pp 12-13 of Fish and Game’s Variation 1 submission.</p> <p>The submitter seeks new Permitted Activity Rules:</p> <ul style="list-style-type: none"> • for changes in land use not from non-milking to milking dairy farming where the changes in numbers of trading and breeding stock do not exceed 15%. • for normal farming activities. <p>As sought, the new activities are not consistent with the requirement to give effect to the NPSFM or the WRPS, promote the sustainable management of natural and physical resources, or give effect to the Vision and Strategy and the Objectives of PPC1.</p>	DISALLOW
Schedule A	PC1-10847	Support in Part with amendment	A statement as to the purpose of for which the information is sought would be more appropriately housed within the methods section, and within the context of the purpose of the Schedule as a whole to facilitate the workability of the provisions.	DISALLOW amendment to include a statement as to the purpose of the Schedule and ADD a statement relating to the purpose of the Schedule to the Methods section.



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Schedule B	PC1-10850	Support in Part with amendment	A statement as to the purpose of for which the information is sought would be more appropriately housed within the methods section, and within the context of the purpose of the Schedule as a whole to felicitate the workability of the provisions.	DISALLOW amendment to include a statement as to the purpose of the Schedule and ADD a statement relating to the purpose of the Schedule to the Methods section.
Schedule C	PC1-10852	Oppose	The Schedule does not seek the provision of information therefore a statement as to the purpose of this is unnecessary/inappropriate. Fish and Game refers to the reasons above under PC1-13153 in relation to the Clean Water 2017 stock exclusion standards.	DISALLOW
Table 3.11-1	PC1-10860	Support	Fish and Game supports the inclusion of a reference to current state, and considers that for some contaminants current loads should be included in PC1.	ALLOW

Fertiliser Association of New Zealand *Submitter ID: 73305*

Address of Original Submitter: greg@fertiliser.org.nz Greg Sneath, PO Box 11519, Manners Street, Central Wellington 6142

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
General	PC1-11168	Oppose	The amendment is not consistent with the RMA and particularly ss 9, 15 and 70.	DISALLOW
3.11.3 Policies	PC1-11176	Oppose	Fish and Game opposes the prescription of an “appropriate” term within the policies without consideration of the effects, including potential and cumulative, of the activity, including contaminants discharged, on the receiving environment, and including the matters set out for determining consent duration of point source consents at pp32-34 of the Fish and Game submission.	DISALLOW or include relief to address the reasons.
Definition – Best Management Practice	PC1-10659	Oppose	The amendment is opposed as it does not differentiate between Best Management Practice and Good Management Practice. Fish and Game relies on its submission above at PC1-10196.	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Definition – Certified Industry Scheme	PC1-10665	Oppose	The amendments undermine transparency and appropriate process and are not supported for the reasons at pp 35-36 of Fish and Game’s original submission.	DISALLOW
Definition – Diffuse Discharge	PC1-10666	Oppose and support in part	The amendment is not consistent RMA terminology including ss 15 and 70 RMA, and the definition ‘discharge’. Fish and Game supports the inclusion of ‘forestry’ as the definition should encompass all activities covered by PPC1.	DISALLOW
Definition - Drain	PC1-10668	Oppose	The amendment arbitrarily narrows the definition and raises ambiguity as to the meaning of ‘open’ (ie, type, extent and location of coverage). If the exemption is intended to relate to stock access, this should be addressed in those provisions.	DISALLOW

Fonterra Co-operative Group Ltd *Submitter ID: 74057*

Address of Original Submitter: richard.allen2@fonterra.com, Richard Allen, 80 London Street, PO Box 459, Hamilton 3204

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
General	PC1-10451	Oppose	<p>Fish and Game opposes the differentiation between “short term freshwater objectives” and “long term objectives” as both sets of targets were arrived at within the same CSG process, which is reflected in the foreword to the plan and the CSG records, and the short term objectives are based on achieving a portion of the long term objectives. The differing terminology is not therefore necessary and brings into question whether some objectives are more important or more binding than others.</p> <p>Fish and Game supports the inclusion of “Water quality Attribute states” however does not consider the context requires additional inclusion of this phrase, as “limits” and “targets” have been appropriately referred to.</p>	DISALLOW
Area covered by Chapter 3.11	PC1-11254	Oppose	The amendment to the 4 th para on p 11 sought does not accurately reflect the interpretation for FMUs under the NPS-FW, and the original wording should be	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			retained.	
Reasons for adopting Objective 1	PC1-10622	Oppose	Fish and Game rejects the implication that Objective 1 is the only part of PC1 which is intended to give effect to the Vision and Strategy. The Plan Change, when operating as a whole planning document should give effect to the Vision and Strategy, and there should be an integrated, holistic and coordinated approach to management.	DISALLOW
Reasons for adopting Objective 3	PC1-10625	Oppose	Fish and Game rejects the implication that Objective 3 is the only part of PC1 which is intended to operate as a Freshwater Objective for the purposes of the NPS-FM. The Plan Change, when operating as a whole planning document should give effect to the NPS-FM; Fish and Game relies on the reasons above under PC1-10451.	DISALLOW
Policy 4	PC1-10471	Oppose	While Fish and Game supports appropriate signalling to industry, the Policy 4A that lower discharging activities will have to make further reductions in the future does not appropriately signal the role higher discharging activities will need to continue to play in phasing out overallocation over time. Fish and Game opposes the use of Policy 4B to manage reductions over time for the reasons in relation to the use of CISs set out at pp 35-36 of its submission.	DISALLOW
Policy 8	PC1-10489	Support in part	Fish and Game supports submission of FEPs by 1 July 2020 as this facilitates the operation of the plan and ensures limits and targets can be met.	ALLOW amendment for date of FEP submission.
Policy 11	PC1-10601	Oppose in part and support in part	In relation to Policy 11A, Fish and Game does not support the removal of the reference to positive effects on the environment and the replacement of <i>all</i> with <i>any</i> , for reasons set out at pp 30-31 of its submission. The inclusion of 11A d) is supported and consistent with Fish and Game's submission at pp30-31.	ALLOW new policy, including 11Ad and DISALLOW deletion and replacement of original text.
Schedule B	PC1-10517	Support	Fish and Game supports the additional Part eA which is a method of addressing overseer updates.	ALLOW
Schedule 1	PC1-10559	Support	The management plans referred to should be part of the FEP rather than a deemed	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			FEP, as FEPs require broader considerations the wastewater irrigation management. The inclusion of g is supported as including a relevant farm activity.	
Schedule 2	PC1-10561	Support in part	The amendments improve the workability and clarity of the provision and improve accountability for those registered to a CIS, however do not address all concerns in relation to CISs for the reasons set out at pp 35-36 of the Fish and Game submission.	ALLOW
Additions to Glossary of Terms	PC1-10616	Oppose	Fish and Game opposes the use of 'effective hectares' as farming operations and their mitigation practices and successional changes in land use should be viewed holistically in order to accurately assess and account for changes in activities over time and progressive reductions in contaminant losses from enterprises or properties as a whole. Fish and Game opposes the definition of 'protected wetland' for the reasons above and because it excludes constructed wetlands which require appropriate management practices to function as a mitigation and house the same aquatic biodiversity and ecosystem service values as other wetlands.	DISALLOW
Definition – Point Source Discharge	PC1-10593	Oppose	Irrigation onto land from a consented facility should be captured by the plan to manage the effects of all activities contributing to overallocation. Otherwise, the amendments do not promote sustainable management.	DISALLOW
Discharges	PC1-13193	Support	Promotes sustainable management.	ALLOW

Hamilton City Council *Submitter ID: 74051*

Address of Original Submitter: Paul.Ryan@hcc.govt.nz Paul Ryan, Private Bag 3010, Hamilton 3240

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
General	PC1-10061	Oppose	Fish and Game opposes the statement that it may take further time for the 80 year targets specified to be achieved as this does not give effect to the Objectives	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			of the Plan Change, the Vision and Strategy, the NPS FM or the RPS or promote sustainable management.	
3.11.1 Values	PC1-10170	Oppose	The amendment is unnecessary as the drainage functions described are already encapsulated in existing values.	DISALLOW
Use Values – Commercial, Municipal and Industrial use.	PC1-10152	Oppose	The amendments including in relation to ‘working rivers’ are opposed and are not consistent with giving effect to the Vision and Strategy, the NPS FM, the Waikato RPS or promote sustainable management.	DISALLOW
Use Values- Mitigating flood hazard	PC1-10167	Oppose	The inclusion of livestock is opposed as methods other than flood management schemes are available for the protection of livestock. The amendment does not promote sustainable management.	DISALLOW
3.11.3	PC1-10259	Oppose in part and support in part	Increased urbanisation and resulting discharges should be considered under the same framework as all discharges and Policy 5a is therefore opposed. Policy 10a is unnecessary as all point source consents will fall under PC1 as it becomes operative. Policy 12a is supported for the reasons in pp30-33 Fish and Game submission, however the relief sought in the Fish and Game submission for amendment to Policy 12 addresses the concern.	DISALLOW
Additions to glossary of terms	PC1-10208	Support in Part with amendment	The amendments proposed promote sustainable management.	ALLOW
Definition- Point source discharge	PC1-11049	Oppose	The amendments to exclude certain discharges does not promote sustainable management.	DISALLOW

Horticulture New Zealand (HortNZ) Submitter ID: 73801

Address of Original Submitter: astra.foster@hortnz.co.nz, Astra Foster, PO Box 10-232, Wellington 6143

Plan Section	Submission point ID	Support or oppose	Reasons for support or opposition of submission	Decision sought (allow or disallow)
--------------	---------------------	-------------------	---	-------------------------------------



Statutory managers of freshwater sports fish, gamebirds and their habitats.

		submission		
General	PC1-9899	Oppose in part	The submitter makes submissions which impact sustainable management and whether PC1 gives effect to the Vision and Strategy.	ENSURE any amendments policy is consistent with sustainable management under the RMA and gives effect to the NPS FM and Vision and Strategy.
Objective 3	PC1-9945	Support in part and oppose in part	The inclusion of a sub catchment target load table and reduction targets is supported for the reasons in pp 10-15 of Fish and Game’s submission, however the wording should be “ <i>and</i> ” rather than “ <i>or</i> ” achievement as the loads sought should reflect the attribute targets. The loads should be amended to represent ecosystem health.	ALLOW linkage to load targets which reflect the load targets and ENSURE load targets represent ecosystem health. DISALLOW “ <i>or</i> ” and replace with “ <i>and</i> ”.
Objective 4	PC1-10005	Support in part and oppose in part	Fish and Game relies on the reasons above under PC1-9945 in relation to amendment to a. The amendments to c. and d. are supported as providing greater capabilities to land users to plan and invest appropriately for the future, but further amendment is needed to make sufficient signals for land users and promote sustainable management.	ALLOW linkage to load targets which reflect the load targets and ENSURE load targets represent ecosystem health. DISALLOW “ <i>or</i> ” an replace with “ <i>and</i> ”. ALLOW amendment to include c. and d. and amend further to ENURE the provision promotes sustainable management.
Reasons for adopting objective 4	PC1-10017	Oppose	The amendment does not promote sustainable management.	DISALLOW
3.11.5 Rules	PC1-10162	Support in part and oppose in part	Fish and Game does not oppose land users working together through catchment collectives to gain collective consents, however does not consider it is appropriate to do so through a separate rule as this may fragment management approaches according to the nature of the party gaining consent. It is more appropriate that all applicants operate within the same rule framework, in order to promote	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			sustainable management and for the reasons at pp 42-43 of Fish and Game’s submission.	
Schedule 1	PC1-12435	Support with amendment and oppose in part	Fish and Game considers a new Schedule 1B to be an alternative to vegetable growing minimum standards, with amendments to the related rules and further additions to the standards and terms included that link N discharges to targets and timeframes and other requirements for managing contaminant loads, to ensure the Schedule promotes sustainable management and is consistent with achieving the requirements of the Vision and Strategy and the NPS FM. Fish and Game relies on the reasons at pp 42-44 of its submission.	RETAN minimum input standards for vegetable growing AND DISALLOW replacement vegetable growing minimum standards with Schedule 1B UNLESS further amendment: <ul style="list-style-type: none"> • Ensures N is managed to targets and timeframes for subcatchment loads to be achieved; • All contaminants are managed in a way which promotes sustainable management and gives effect to the Vision and Strategy and the NPS FM, and the healthy, swimmable and fishable goals of PC1.
Schedule 1	PC1-10215	Support with amendment and oppose	Fish and Game supports a new schedule to provide for sub-catchment scale solutions achieved through catchment collectives, however there must be a clear link with the rule framework which should apply consistently for all applicants. The Schedule as proposed delegates a WRC function and authority to another party without proper process, and lacks the required accountability structures. The inclusion of a sub catchment target load table and reduction targets is supported for the reasons in pp 10-15 of Fish and Game’s submission, however the loads should be amended to represent ecosystem health.	DISALLOW
Additions to Glossary of Terms	PC1-10227	Support in part with	Definition of catchment collectives is required if provision such groups are to be enabled to gain consent under PPC1.	ALLOW definition of sub catchment collectives and



Statutory managers of freshwater sports fish, gamebirds and their habitats.

		amendment	Sub-catchment Scale Management Plan definition is flawed for the reasons outlined above under PC1-10215.	ENSURE that where these may gain consent, they operate under a global consent which exists within a framework which phases out over-allocation across the Waikato Catchment and sub-catchments. DISALLOW definition of SSMPs.
Definition - Enterprise	PC-10232	Support with amendment	The amendment provides a simpler and less ambiguous approach as it does not require definition of the principal land use. Clarity is required for the instances where an enterprise spans more than one sub catchment.	ALLOW amendment EXCEPT amendment to provide clarity where an enterprise spans more than one subcatchment.

Mercury NZ Limited *Submitter ID: 73182*

Address of Original Submitter: miles.rowe@mercury.co.nz, Miles Rowe, PO Box 445, Hamilton 3240

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Te Mana o Te Wai	PC1-9503	Support in part with amendment	Retaining 3.11.1 assists in giving effect to the Vision and Strategy, however amendment may be required to reflect amendments to values sought by Fish and Game.	ALLOW retaining 3.11.1, and ENSURE the schematic is consistent with Values sought by Fish and Game.

Miraka Limited *Submitter ID: 73492*

Address of Original Submitter: Grant.Jackson@miraka.co.nz, Grant Jackson, 108 Tuwharetoa Street, PO Box 740, Taupo 3352

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)



Statutory managers of freshwater sports fish, gamebirds and their habitats.

3.11	PC1-8742	Support	The amendment promotes sustainable management and is consistent with the NPS FM.	ALLOW
------	----------	---------	--	-------

National Wetland Trust *Submitter ID: 73420*

Address of Original Submitter: davecanniep@gmail.com

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
3.11.4.5	PC1-10762	Support	The submission promotes sustainable management and is consistent with the RPS, NPS FM and Vision and Strategy.	ALLOW

New Zealand Forest Owners Association Inc *Submitter ID: 73524*

Address of Original Submitter: David.rhodes@nzfoa.org.nz Venise Comfort Level 9, 93 The Terrace, Wellington 6143

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
3.11.4	PC1-9953	Support	The amendment promotes sustainable management and is consistent with the requirements to give effect to the NPS FM, the Vision and Strategy and the RPS.	ALLOW

Oji Fibre Solutions (NZ) Limited *Submitter ID: 73725*

Address of Original Submitter: gkchappell@xtra.co.nz, C/o Gill Chappell, PO Box 87070, Meadowbank, Auckland 1742

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Co-management of the Waikato and Waipa Rivers	PC1-6165	No clear relief to support or	Amendment will be required to this section of the plan to give effect to the NPS and the Vision and Strategy.	ENSURE the section reflects the requirements of the NPS FM, the Vision and Strategy and



Statutory managers of freshwater sports fish, gamebirds and their habitats.

		oppose		promotes sustainable management.
Collaborative approach	PC1-6178	Support in part	Fish and Game supports the recognition that there was no consensus, and that involvement in the CSG was by invitation only issues by WRC.	ALLOW
3.11.2	PC1-6364	Support with amendment	<p>Fish and Game considers reliance on BPO in this context can only be effective if it operating within clear parameters of environmental limits, timeframes and specification of the effects the options are intended to managed. If BPO is not applied within these specified factors, the focus will be on what is practicable when cost is high, and avoidance of high cost rather than the Objectives and outcomes required. The provision will not promote sustainable management or be consistent with the requirement to give effect to the Vision and Strategy. To achieve the healthy, swimmable and mahinga kai goals of the plan, some measures may be required which are high cost, and this should be acknowledged. BPO should be enabled only where the desired in stream limits and loads are stated and the required reductions to achieve those loads are specified at a property-scale, within specified timeframes to phase out overallocation.</p> <p>Fish and Game opposes b) as this confuses contaminant discharges and natural groundwater flows. C) and d) are opposed as being already represented elsewhere in the objectives and not promoting sustainable management.</p>	DISALLOW and ENSURE any provision for management of land use through BPO operates within a clear framework which specifies desired loads, reductions required and discharge limits to a property scale, to occur within specified timeframes.
Objective 2	PC1-6366	Oppose	The three wellbeings should not be removed and balanced against other considerations as this does not promote sustainable management.	DIALLOW
Objective 3	PC1-6370	Oppose	Reasons under PC1-6364.	DISALLOW
Objective 4	PC1-6389	Oppose	Reasons under PC1-6364.	DISALLOW
Policy 2	PC1-12859	Oppose	Reasons under PC1-6364.	DISALLOW
Policy 3	PC1-6400	Oppose	Reasons under PC1-6364.	DISALLOW
Policy 4	PC1-6401	Oppose	Reasons under PC1-6364.	DISALLOW
Policy 5	PC1-6403	Oppose	Reasons under PC1-6364.	DISALLOW
Policy 7	PC1-6423	Support in part and Oppose in	Fish and Game support clarification that any future allocation will not be grandparented or based on existing land use as this promotes sustainable management.	ALLOW clarification that any future allocation will not be grandparented or based on



Statutory managers of freshwater sports fish, gamebirds and their habitats.

		part	Fish and Game opposes the remainder of the submission for the reasons under PC1-6364.	existing land use. DISALLOW remainder of relief sought.
3.11.5 Rules	PC1-7704	Oppose	The submitter seeks a new restricted discretionary activity for Certified Industry Schemes. Fish and Game opposes for the reasons set out in pp41-42 of its submission.	DISALLOW
3.11.5.4	PC1-8113	Oppose	The amendments to a permitted activity result in a permitted activity which does not meet the requirements of s 70 RMA and is not consistent with planning and legal requirements for permitted activities.	DISALLOW
3.11.5.7	PC1-8716	Oppose	Fish and Game opposes the amendments sought for the reasons under PC1-6364, the reasons at p 46 of Fish and Game's submission and the reasons at pp12-13 of Fish and Game's Variation 1 submission.	DISALLOW
Additions to Glossary of Terms	PC1-12311	Oppose	Amendment to define regionally significant industry should be consistent across RMA planning documents and not apply a separate standard for 3.11, and should promote sustainable management.	DISALLOW
Definition – Good Management Practice	PC1-8937	Oppose	Amendment does not promote sustainable management.	DISALLOW
Water Takes	PC1-8953	Oppose	Amendment does not promote sustainable management, is not consistent with the requirement to give effect to the Vision and Strategy, the NPS FM or the RPS.	DISALLOW
Discharges	PC1-8954	Oppose	Deletion of the consequential amendments to 3.5 does not promote sustainable management, is not consistent with the requirement to give effect to the Vision and Strategy, the NPS FM or the RPS.	DISALLOW
Non-Point Source Discharges	PC1-8959	Oppose	Deletion of the consequential amendments to 3.9 and amending 3.9 to include parts of 3.11 does not promote sustainable management, is not consistent with the requirement to give effect to the Vision and Strategy, the NPS FM or the RPS.	DISALLOW
River and Lake Bed Disturbances	PC1-8961	Oppose	Amendment does not promote sustainable management, is not consistent with the requirement to give effect to the Vision and Strategy, the NPS FM or the RPS.	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Pamu Farms of New Zealand Submitter ID: 74000

Address of Original Submitter: Robert van Duivenboden, Landcorp Farming Limited Level 2, 15 Allen Street Te Aro Wellington 6011

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
General	PC1-5751	Support	The amendments sought promote sustainable management.	ALLOW
Full achievement of the Vision and Strategy will be intergenerational	PC1-5847	Support	The amendments sought promote sustainable management and are consistent with the requirement to give effect to the Vision and Strategy, the NPS FM and the RPS.	ALLOW
Policy 2	PC1-5754	Support	Promotes sustainable management.	ALLOW
Policy 7	PC1-5940	Support	Promotes sustainable management.	ALLOW
Definition - Milking Platform	PC1-5938	Support with amendment	Fish and Game supports accommodating for integral cut and carry operations and how winter milking businesses operate to promote sustainable management however the amendments sought do not provide a clear and workable alternative to the current wording.	DISALLOW
Definition – Nitrogen Reference Point	PC1-5932	Support with amendments	The amendments sought would promote sustainable management however do not provide a clear and workable alternative to the current wording.	DISALLOW

Ravensdown Limited Submitter ID: 74058

Address of Original Submitter: chris@rmaexpert.co.nz C/o Planz Consultants Attn: Carmen Taylor, 8 Stafford St, Dunedin 9016

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Objective 3	PC1-10099	Oppose	The note sought does not promote sustainable management, is not consistent with the requirement to give effect to the Vision and Strategy, the NPS FM, the RPS or support the swimmable, mahinga kai and health goals of PC1.	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

3.11.3	PC1-10121	Oppose	Fish and Game relies on the reasons and relief sought in pp 30-34 of its submission.	DISALLOW
3.11.5	PC1-10158	Oppose	The new rules proposed do not promote sustainable management, is not consistent with the requirement to give effect to the Vision and Strategy, the NPS FM, the RPS or support the swimmable, mahinga kai and health goals of PC1.	DISALLOW

South Waikato District Council *Submitter ID: 72892*

Address of Original Submitter: Sharon.robinson@southwaikato.govt.nz Sharon Robinson, Private Bag 7, Tokoroa 3444

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Policy 10	PC1-4056	Oppose	The definitions of regionally significant infrastructure and regionally significant industry should be consistent with the WRPS and the WRP and ensure that users do not rely on terminologies appearing in non-regional planning documents. Definitions should apply throughout the WRP rather than only to 3.11. As drafted, the definitions do not meet these requirements and promote sustainable management. Fish and Game relies on the reasons at p30 of its submission.	DISALLOW
Additions to Glossary of Terms	PC1-9724	Oppose	Reasons under PC1-4056.	DISALLOW

The Royal Forest and Bird Protection Society *Submitter ID: 74122*

Address of Original Submitter: j.miller@forestandbird.org.nz Jen Miller, PO Box 2516, Christchurch 8140

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
General	PC1-8011	Support in part	Fish and Game support amendments to reduce the timeframe for achieving ecosystem health and amendment to the water quality objective to ensure they achieve ecosystem health. The amendments are consistent with achieving ecosystem health in accordance with the swimmable, healthy and mahinga kai goals of PC1, and Fish and Game's submission, and are supported.	ALLOW
Objective 1	PC1-8218	Support	The amendment promotes sustainable management, and is consistent with the	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			Vision and Strategy and the NPS FM.	
Objective 2	PC1-8220	Support	The amendment promotes sustainable management, and is consistent with the Vision and Strategy and the NPS FM.	ALLOW
Objective 3	PC1-8221	Support	The amendment promotes sustainable management, and is consistent with the Vision and Strategy and the NPS FM.	ALLOW
Objective 5	PC1-8226	Support	The amendment promotes sustainable management, and is consistent with the Vision and Strategy and the NPS FM.	ALLOW
Reasons for adopting Objective 1	PC1-8228	Support	The amendment promotes sustainable management, and is consistent with the Vision and Strategy and the NPS FM.	ALLOW
Reasons for adopting Objective 2	PC1-8229	Support	The amendment promotes sustainable management, and is consistent with the Vision and Strategy and the NPS FM.	ALLOW
Reasons for adopting Objective 3	PC1-8230	Support	The amendment promotes sustainable management, and is consistent with the Vision and Strategy and the NPS FM.	ALLOW
Policy 3	PC1-8207	Support in part	Fish and Game considers that appropriate rules and activity statuses are required to give effect to Policy 3 and promote sustainable management, including permitted activities and non-complying activity status for increases in contaminants associated with commercial vegetable production. Fish and Game relies on the reasons in pp 27-28 of its submission.	<p>ALLOW amendments to change activity statuses SUBJECT TO rules operating within a framework which:</p> <ul style="list-style-type: none"> • Ensures N is managed to targets and timeframes for subcatchment loads to be achieved; • Manages all contaminants in a way which promotes sustainable management and gives effect to the Vision and Strategy and the NPS FM, and achieves the healthy, swimmable and fishable goals of PC1.



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Policy 4	PC1-8256	Support	The amendment promotes sustainable management, and is consistent with the Vision and Strategy and the NPS FM.	ALLOW
Policy 5	PC1-8257	Support	The amendment promotes sustainable management, and is consistent with the Vision and Strategy and the NPS FM.	ALLOW
Policy 6	PC1-8258	Support	The amendments provide requisite guidance to plan users and are consistent with the amendments sought by Fish and Game at pp12-13 Variation 1 Submission and p 29 original submission.	ALLOW
Policy 7	PC1-8259	Support	The amendments promote sustainable management, are consistent with the Vision and Strategy and the NPS FM, and achieving ecosystem health in accordance with the swimmable, healthy and mahinga kai goals of PC1.	ALLOW amendment SUBJECT TO amendments sought by Fish and Game to implement allocation through PC1.
Policy 9	PC1-8253	Support in Part	The submitter seeks amendment to ensure that actions such as edge of field mitigations are included in the standards, matters of control and discretion and FEPs. The amendments are supported as required to ensure all mitigation actions are captured appropriately within the rule framework and promote sustainable management.	ALLOW amendment to ensure that actions such as edge of field mitigations are included in the standards, matters of control and discretion and FEPs.
Policy 14	PC1-8335	Support	Shorter timeframes promote sustainable management, are consistent with the requirement to give effect to the Vision and Strategy and the NPS FM.	ALLOW
3.11.4.12	PC1-8414	Support	The schedules sought promote sustainable management.	ALLOW
Schedule 1	PC1-12539	Support	The inclusions promote sustainable management, are consistent with the requirement to give effect to the Vision and Strategy and the NPS FM.	ALLOW
Schedule 1	PC1-12538	Support	The inclusions promote sustainable management, are consistent with the requirement to give effect to the Vision and Strategy and the NPS FM.	ALLOW
Definition – Arable cropping	PC1-8452	Support	Promotes sustainable management.	ALLOW
Definition – Best Practice Management	PC1-8192	Support in part with amendment	The amendments sought assist to promote sustainable management, however Fish and Game considers that Good and Best Practice Management provisions are not sufficient to achieve the Objectives of the Plan and the swimmable, fishable and ecosystem health goals within the timeframes required, and therefore give effect to the Vision and Strategy, and the NPS FM. Fish and Game supports an allocation framework which phases out overallocation within a prescribed timeframe based on desired in-stream loads which are consistent with ecosystem	ALLOW amendment to define BMP and ENSURE this operates within a framework which phases out overallocation within a prescribed timeframe based on desired in-stream loads which are consistent with



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			health as necessary to achieve these requirements.	ecosystem health and are reduced to specified levels throughout the timeframe.
Definition - Certified Farm Environmental Planner	PC1-8478	Support	Promotes sustainable management.	ALLOW
Definition – Certified Farm Nutrient Advisor	PC1-8494	Support	Promotes sustainable management.	ALLOW
Definition - Cultivation	PC1-8678	Support	Promotes sustainable management.	ALLOW
Definition – Dairy Farming	PC1-8685	Support	Promotes sustainable management.	ALLOW
Definition – Diffuse discharges	PC1-8694	Support	Promotes sustainable management.	ALLOW
Definition - Drain	PC1-8696	Support	Promotes sustainable management.	ALLOW
Definition – Drystock Farming	PC1-8697	Support	Promotes sustainable management.	ALLOW
Definition – Edge of field mitigation	PC1-8698	Support	Promotes sustainable management.	ALLOW
Definition - EColi	PC1-8700	Support	Promotes sustainable management.	ALLOW
Definition - Five-year rolling average	PC1-8703	Support	Promotes sustainable management.	ALLOW
Definition – Forage crop	PC1-8704	Support	Promotes sustainable management.	ALLOW
Definition – Mahinga Kai	PC1-8708	Support	Promotes sustainable management.	ALLOW
Definition – Microbial pathogen	PC1-8708	Support	Promotes sustainable management.	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Definition – Point source discharge	PC1-8722	Support	Promotes sustainable management.	ALLOW
Definition - Restoration	PC1-8723	Support with amendment	The definition should be retained but reference to specified timeframes is required to promote sustainable management, and in order to give effect to the Vision and Strategy and NPS.	ALLOW and ENSURE the definition contains reference to specified timeframes.
Definition- Setback	PC1-8724	Support	Promotes sustainable management.	ALLOW

Waikato and Waipa River Iwi Submitter ID: 74035

Address of Original Submitter: damian@kahuilegal.co.nz, Damian Stone, Kahui Legal, PO Box 1654, Wellington 6140.

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
3.11.2 Objectives	PC1-3301	Support with amendment	Fish and Game support the new Objective and Reasons (providing it is not intended to replace the existing Objective 6, which should be retained), which promotes sustainable management, assists to give effect to the Vision and Strategy and the NPS FM. Lake Management Plans should operate within specified timeframes and limits set to achieve or retain ecosystem health, rather than 'guide' as to the outcomes sought, to ensure the restoration and protection goals can be achieved. Fish and Game considers that the attribute Targets in Table 3.1-1 will require amendment to ensure lakes are restored to a standard consistent with ecosystem health and to protect lakes from further degradation as a result of contaminants' impacts on lake ecological processes or lakes reaching tipping points and/or changing trophic state.	ALLOW amendment, SUBJECT TO: <ul style="list-style-type: none"> Retaining existing Objective 6 relating to the Whangamarino Wetland; DELETING reference to Lake Management Plans and ENSURING lakes management plans operate as a Method (rather than an Objective) within a framework of specified limits and timeframes; Amendment to Table 3.11-1 to ensure attributes and targets reflect restoration of and protection of ecosystem health.



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Objective 1	PC1-3245	Support	Objective 1 should provide for achieving outcomes by 2096 at the latest or sooner where practicable to give effect to the Vision and Strategy, The NPSFM, and promote sustainable management.	ALLOW
Policy 6	PC1-3315	Support	The amendment to 'identified and sustained' is supported as promoting sustainable management.	ALLOW
3.11.4	PC1-3519	Oppose and Support in part with amendment	The use of a decision support tool may be enabled, provided decisions are required to occur within a framework of rules which achieves the healthy, swimmable, and mahinga kai goals of the Vision and Strategy according to specified limits and timeframes and promotes sustainable management.	IF the use of a decision support tool is enable, ENSURE this is SUBJECT TO this operating within timeframes and limits set to achieve the healthy, swimmable and mahinga kai goals of the Plan, giving effect to the vision and strategy and the NPS FM, and promoting sustainable management.
Definition – Intermittently flowing river	PC1-3542	Oppose	Fish and Game opposes these water-bodies being expressly excluded from Schedule C; intermittent waterways are an important source, pathway, and receiving environment (particularly when forming part of a sensitive or significant water body) for contaminant discharge to waterways and inputs should be managed	DISALLOW
Definition – Intermittently flowing river	PC1-3675	Oppose	Fish and Game opposes these defined water bodies being excluded from stock exclusion regulations as they are an important source, pathway, and receiving environment (particularly when forming part of a sensitive or significant water body) for contaminant discharge to waterways and should be managed..	DISALLOW

Waikato Regional Council Submitter ID: 72890

Address of Original Submitter: Andrew.test@waikatoregion.govt.nz Andrew Tester, Private Bag 3038, Waikato Mail Centre, Hamilton 3240.

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
--------------	---------------------	------------------------------	---	-------------------------------------



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Policy 10	PC1-3061	Oppose	Fish and Game has sought that the provision be removed, however if the provision is to be retained or provision for regionally significant infrastructure included elsewhere, the new working is not supported as it does not promote sustainable management and enable the effects of flood drainage management to be assessed and managed appropriately.	DISALLOW
Policy 11	PC1-3062	Oppose	Reasons at pp 30-31 Fish and Game submission and below under PC1-3066. The amendment does not promote sustainable management.	DISALLOW
Policy 12	PC1-3066	Oppose	Additional clause e) is opposed because it does not make clear that flood and drainage infrastructure may contribute to contaminant loads in some sub catchments which may not have otherwise received such loads if the infrastructure had not been in place. The amendment also fails to recognise that alteration to loads which would naturally be conveyed by floodwaters into a subcatchment may have an effect on waterbodies, and the effect may be different across receiving subcatchments dependent on the aquatic ecosystems they house. Receiving subcatchments may house significant sensitive waterbodies, and this should be recognised. The amendment does not promote sustainable management.	DISALLOW additional e).
Policy 13	PC1-3095	Oppose	Reasons at pp32 -33 Fish and Game submission.	DISALLOW
3.11.4.4	PC1-3103	Oppose	The amendments do not promote sustainable management, are not consistent with giving effect to the Vision and Strategy, the NPS FM or the RPS. The amendment “to develop a future plan change” is unclear and lacks the urgency required to ensure lakes are appropriately managed, restored and protected.	DISALLOW
3.11.4.8	PC1-3111	Oppose	The amendment does not promote sustainable management, are not consistent with giving effect to the Vision and Strategy, the NPS FM, the RPS or the Objectives of the Plan.	DISALLOW
3.11.5.2	PC1-3117	Oppose in part	The submitter seeks amendment to implementation dates. Further delay substantially increases risk of increased degradation of sensitive and already degraded waterbodies. There is no basis for further extension of implementation dates and extension does not promote sustainable management or give effect to the Vision and Strategy and NPS FM.	DISALLOW further extension of implementation dates.
3.11.5.3	PC1-3417	Oppose in part	Reasons above under PC1-3117 in relation to extension of implementation dates.	DISALLOW further extension of implementation dates.



Statutory managers of freshwater sports fish, gamebirds and their habitats.

3.11.5.4	PC1-3420	Oppose in part and Support in part	<p>Reasons above under PC1-3117 in relation to extension of implementation dates.</p> <p>Fish and Game supports the introduction of provisions throughout PC1 to enable the reassignment of an NRP, or other property level N input standard or leaching assessment, between properties when new land is incorporated into a property.</p> <p>Fish and Game supports amendment to require compliance with the NRP, or other property level N input standard or leaching assessment, under 3.11.5.4(5).</p>	<p>DISALLOW further extension of implementation dates.</p> <p>ALLOW amendment to allow reassignment of an NRP, or other property level N input standard or leaching assessment, between properties when new land is incorporated into a property.</p> <p>ALLOW amendment to 3.11.5.4(5).</p>
3.11.5.5	PC1-3444	Oppose in part and support in part	<p>Reasons above under PC1-3117 in relation to extension of implementation dates.</p> <p>Fish and Game support removal pursuant to 3.11.5.5(g) being in the same subcatchment as it promotes sustainable management and is consistent with appropriately managing effects.</p> <p>Fish and Game supports amendment to 3.11.5.5 to remove the ability for an enterprise to hold and NRP and restrict the NRP to exist only with a particular parcel of land. The amendment is supported as consistent with the provisions of the RMA and promoting sustainable management.</p>	<p>DISALLOW further extension of implementation dates.</p> <p>ALLOW amendment to 3.11.5.5(g).</p> <p>ALLOW amendment to remove the ability for an enterprise to hold and NRP and restrict the NRP to exist only with a parcel of land</p>
3.11.5.6	PC1-3477	Support	The additional matter of control is supported as promoting sustainable management and enabling the plan to give effect to the Vision and Strategy, the NPS FM and the Objectives of the Plan.	ALLOW
Schedule B	PC1-3553	Support in part with amendment	The amendments sought enhance and improve the reliability of FEPS and the clarity for users and promote sustainable management. Fish and Game has sought additional amendment to Schedule B and relies on the reasons (pp42-46) and amendments (pp 60-63) in its submission.	ALLOW
Schedule C	PC1-3571	Support	The amendments promote sustainable management and assist plan users in	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			applying the provision.	
Schedule 1	PC1-3575	Support in part with amendment	<p>Fish and Game considers the following amendments promote sustainable management and assist plan users in applying the provision:</p> <ul style="list-style-type: none"> • Measuring compliance based on whether the mitigation actions listed in the FEP are completed, however further amendment will be required to link proposed mitigations to timeframes and limits to ensure completion of such can be assessed; • Deletion of “unless other mitigations are specified”; • More clarity as to how the discretion available in the provision “may” be exercised (Fish and Game supports discretion where discretion is available specified standards, limits and timeframes which must be achieved). 	<p>ALLOW the following amendments:</p> <ul style="list-style-type: none"> • Measuring compliance based on whether the mitigation actions listed in the FEP are completed, SUBJECT TO” mitigations being linked to timeframes and limits to ensure completion of such can be assessed; • Deletion of “unless other mitigations are specified”; • More clarity as to how the discretion available in the provision may be exercised AND ENSURE there is clarity that discretion is available within specified standards, limits and timeframes which must be achieved
Schedule 1	PC1-12545	Oppose in part	<p>Cultivation on slopes over 25 degrees should be avoided to promote sustainable management and give effect to the Objectives of PC1.</p> <p>The Schedule should provide more guidance as to buffer distances required, having regards to factors such as slope. Fish and Game has sought a Schedule based on ESC slope class (p64 Fish and Game submission) and this should be linked here. Buffers are a vital mitigation tool and clear guidance should be provided to plan users to ensure that mitigation actions and timeframes promote sustainable management, are sufficient to give effect to the Vision and Strategy, the NPS FM and the Objectives sought. The amendment sought is overly flexible,</p>	<p>DISALLOW amendment of “avoided” to minimised.</p> <p>DISALLOW amendment to provide for a lesser distance for buffers and instead ENSURE any flexibility as to buffer distance is provided for according to ESC slope class (as in the NPS Forestry) and ENURE 5m is the</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			and enables buffers of under 5m which will not ensure effects of activities adjacent to waterways are appropriately managed.	minimum distance available.
Table 3.11-1	PC1-3635	Oppose in part	The Clarity attribute under Table 3.11-1 must reflect the Objectives of PC1 rather than the methods and should be amended to give effect to the Objectives and the Vision and Strategy.	DISALLOW amendment to Clarity attributes or Methods to get alignment between the two AND INSTEAD AMEND Table 3.11-1 to get alignment with the Objectives and the Vision and Strategy and ENSURE Methods align with those states/limits/targets.
Table 3.11-2	PC1-3646	Support in Part	If the two sub-catchments (46 and 52) are merged, Fish and Game supports the resulting Waitomo Catchment being listed as Priority 1; Fish and Game considers high priority is required for Catchments within the Waipa system.	IF sub-catchments 46 and 52 are merged, ALLOW "Waitomo Catchment" to be listed as Priority 1.
Map 3.11-2	PC1- 3651	Support in Part	Reasons above under PC1-3646.	IF sub-catchments 46 and 52 are merged, ALLOW "Waitomo Catchment" to be listed as Priority 1.
Additions to Glossary of Terms	PC1-3666	Support	The amendments are supported as they aid workability of the plan and clarity for plan users; the amendment for wetlands are supported as promoting sustainable management and giving effect to the Vision and Strategy, the NPS FM, the RPS and the Objectives of the Plan.	ALLOW
Definition – Best Management Practice	PC1-3665	Support	Clarification that this includes mitigation that can be achieved through changes to management practices promotes sustainable management.	ALLOW
Definition – Edge of field mitigation	PC1-3667	Support	Definition of 'edge of field' is required.	ALLOW
Definition – Point source discharges	PC1-3680	Oppose	Reasons under PC1-3066. The amendment does not promote sustainable management.	DISALLOW
Definition - Restoration	PC1-3679	Support in Part	The definition should be retained, reference to specified timeframes is required to promote sustainable management, and to give effect to the Vision and	ALLOW and ENSURE the definition contains reference to



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			Strategy and NPS.	specified timeframes.
Definition – Stock Unit	PC1-3681	Support	Promotes sustainable management.	ALLOW amendments sought.
Consequential amendments to WRP	PC1-3685	Support	The amendments in regards to 3.3.4.38 are supported and promote sustainable management.	ALLOW amendment sought relating to 3.3.4.38.

Waikato River Authority Submitter ID: 74033

Address of Original Submitter: bob@waikatoriver.org.nz Bob Penter, PO Box 9338, Hamilton 3204

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
General	PC1-11566	Support in part with amendment	The amendments promote sustainable management. A new Policy for review of methods should apply in the circumstances specified, and in addition should enable review to account for changes in scientific knowledge or information gathered which affects the limits and targets the Methods are required to achieve.	ALLOW a new policy which enables review of Methods and ENSURE the policy enables review to account for changes in scientific knowledge or information gathered which affects the limits and targets the Methods are required to achieve. ALLOW other amendments sought.
3.11.3	PC1-11560	Support	The amendment promotes sustainable management and is consistent with achieving the requirements of the Vision and Strategy and the NPS FM and the Swimmable, Mahinga Kai and ecosystem health goals of PC1.	ALLOW
Policy 12	PC1-11562	Support	The amendment promotes sustainable management and is consistent with achieving the requirements of the Vision and Strategy and the NPS FM and the Swimmable, Mahinga Kai and ecosystem health goals of PC1.	ALLOW
Schedule 1	PC1-11563	Support	Specified timeframes are required and these should be linked to the consent in order to be consistent with legal and planning principles (reasons at p36 Fish and	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			Game submission); the inclusion of timeframes and other mechanisms to strengthen implementation aspects of FEPs is required in order to ensure the FEPs form part of the consent for reasons contained in the Fish and Game submission (pp42-44).	
Table 3.11-1	PC1-11559	Support with amendment	Fish and Game has sought limits consistent with ecosystem health for reasons at pp 10-11, 20-21 of its submission, and considers no limits in Table 3.11-1 should be set which enable increases from current levels in order to give effect to the Vision and Strategy.	ALLOW and ENSURE limits and targets are set to achieve ecosystem health.
Additions to Glossary of Terms	PC1-11565	Support	Fish and Game supports the inclusion of the definition which promotes sustainable management, and is consistent with giving effect to the NPS FM, the Vision and Strategy and the RPS.	ALLOW

Wairakei Pastoral Ltd *Submitter ID: 74095*

Address of Original Submitter: daya.winterbottom@xtra.co.nz Trevor Daya-Winterbottom, PO Box 75-945, Manurewa 2243.

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
General	PC1-11046	Oppose	<p>Approaches outlined in Schedules 2, 3, and 4 do not promote sustainable management and is not consistent with giving effect to the NPS FM or the Vision and Strategy. The whole of sub-catchment approach described is inconsistent with integrated management which recognises interactions ki uta ki tai and managing fresh water and land use and development in catchments in an integrated and sustainable way. The approach is not an appropriate way to deal with cumulative effects on the Waikato River. The approach risks fragmentation of planning between properties or enterprises within a sub catchment.</p> <p>The approach described is not sufficient to achieve the Objectives of the Plan and the swimmable, mahinga kai and ecosystem health goals within the timeframes required, and give effect to the Vision and Strategy, and the NPS FM. Fish and Game considers a framework which phases out overallocation within a prescribed timeframe based on desired in-stream loads which are consistent with ecosystem health as necessary to achieve these requirements, and appropriate signals are</p>	<p>DISALLOW new Schedule 2.</p> <p>DISALLOW new Schedule 3.</p> <p>DISALLOW new Schedule 4.</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>required now for land users to allow them to manage for the required change. These signals are not included in the approach described, and as such it does not promote sustainable management.</p> <p>The approach does not appropriately link mitigation actions to timeframes and actions as part of a consent.</p> <p>Any input load based nutrient cap must be sufficient to achieve instream load limits set to achieve ecosystem health and take a precautionary approach to assessing the load leached from a property or enterprise as a result of an input at the cap. The approach set out in relation to an input cap does not promote sustainable management.</p> <p>Many of the mitigation actions included in the Tables to Schedule 4 may provide a positive step towards restoration and protection and sustainable management, but the approach is deficient for the reasons above. The in-stream effects of each of the 4 contaminants are not addressed within Schedule 4, including mitigation of cumulative effects (the tables address in-stream effects of sediment, but not other contaminants). Some important pathways and sources are absent (ie, stream bank and direct deposition) and the Schedule does not include reference to differing receiving environments on site and effects therein (eg wetlands), or ecosystem services provided by some water bodies (eg healthy wetlands).</p>	
General	PC1-13165	Oppose	<p>Fish and Game considers the stretch referred to may be typified as a river but considers it should be subject to integrated management as part of the whole of the Waikato River mainstem from the Taupo Gates through to the Waikato Estuary which includes both direct and cumulative effects on immediate and downstream environments. In the case of the stretch referred to, the downstream receiving environment includes the whole of the Waikato River, encompassing lakes and the estuarine environment. Fragmentation of management of the Waikato River is not supported.</p>	<p>DISALLOW fragmentation of outcomes sought and management approaches for the Waikato River, and ENSURE integrated management of the Waikato River, and that the objectives, limits and targets achieve ecosystem health throughout the Waikato Catchment.</p>



Statutory managers of freshwater sports fish, gamebirds and their habitats.

General	PC1-13166	Oppose	Reasons above under PC1-13165.	DISALLOW
General	PC1-13166	Oppose	The rationale for the division is not clear, however if such a division is to occur, resulting changes to provisions must ensure integrated management of the Waikato River, and that the objectives, limits and targets are set for each sub-catchment to achieve ecosystem health throughout the Waikato Catchment.	DISALLOW and ENSURE integrated management of the Waikato River, and that the objectives, limits and targets achieve ecosystem health throughout the Waikato Catchment.
Water quality and National Policy Statement for Freshwater Management	PC1-11257	Oppose	The amendments are not consistent with the Vision and Strategy and do not reflect the integrated approach taken in formulating PC1.	DISALLOW
Full achievement of the Vision and Strategy will be intergenerational	PC1-11259	Oppose	Reasons above under PC1-11046.	DISALLOW
Reasons for adopting Objective 4	PC1-11271	Oppose	Reasons above under PC1-11046.	DISALLOW
Policy 1	PC1-11272	Oppose	Reasons above under PC1-11046.	DISALLOW
Policy 2	PC1-12956	Oppose	Fish and Game opposes the amendments sought for the reasons in relation to the sub-catchment management approach and adaptive management approach stated above under PC1-11046.	DISALLOW
Policy 4	PC1-11344	Oppose	Fish and Game opposes the amendments sought for the reasons in relation to the sub-catchment management approach stated above under PC1-11046.	DISALLOW
Policy 5	PC1-11345	Oppose	Fish and Game opposes the amendments sought for the reasons in relation to the sub-catchment management approach and adaptive management approach stated above under PC1-11046.	DISALLOW
Policy 6	PC1-11346	Oppose	Fish and Game opposes the amendments sought for the reasons in relation to the sub-catchment management approach and adaptive management approach stated above under PC1-11046. Fish and Game considers the prescription that	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			consents will “generally be granted” is not an appropriate approach for managing cumulative effects.	
Policy 7	PC1-11347	Oppose	Many of the additional factors listed should only be provided for in the context of an operational allocation system (rather than during a Stage 1 engagement period) and as included will not promote sustainable management or ensure PC1 gives effect to the Vision and Strategy and the NPS FM.	DISALLOW
Policy 8	PC1-11348	Oppose	Reasons above under PC1-11046.	DISALLOW
Policy 9	PC1-11349	Oppose	Reasons above under PC1-11046.	DISALLOW
3.11.4.5	PC1-11361	Oppose	Reasons above under PC1-11046.	DISALLOW
3.11.4.7	PC1-11364	Oppose	Reasons above under PC1-11046.	DISALLOW
3.11.4.8	PC1-11365	Oppose	Reasons above under PC1-11046.	DISALLOW
3.11.5	PC1-11382	Oppose	New Rule 3.11.5.8 does not appropriately assess the effects of such a transfer on the receiving environment associated with the discharge permit and does not promote sustainable management. New Rule 3.11.5.9 as it does not appropriately assess the effects of such and transfer on the receiving environment associated with the discharge permit and does not promote sustainable management.	DISALLOW
3.11.5.6	PC1-11378	Oppose	Fish and Game opposes the amended 3.11.5.6.A, B and C for the reasons above under PC1-11346 and PC1-11046, and because the provision does not appropriately manage cumulative effects, or promote sustainable management.	DISALLOW
3.11.5.7	PC1-11379	Oppose	Fish and Game opposes the amended 3.11.5.7.A, B and C for the reasons above under PC1-11346 and PC1-11046, and because the provision does not appropriately manage cumulative effects, or promote sustainable management.	DISALLOW
Table 3.11-1	PC1-11391	Oppose	The submitter seeks amendments to the Table that are not consistent with achieving the healthy, swimmable and mahinga kai goals of PC1. The numeric values and attributes sought are not consistent with ecosystem health.	DISALLOW
Additions to Glossary of Terms	PC1-11400	Oppose	Fish and Game opposes the definition of ‘Adaptive Management’ for the reasons above under PC1-11046. Fish and Game opposes the definition of ‘Decision Support Tool’ which is not consistent with integrated management.	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

			<p>Fish and Game opposes the definition of ‘Mitigation Measures’ for the reasons above under PC1-11046.</p> <p>Fish and Game opposes the definition of ‘Sub-catchment management plan’ for the reasons above under PC1-11046.</p>	
--	--	--	---	--

Watercare Services Ltd *Submitter ID: 74077*

Address of Original Submitter: mark.bourne@water.co.nz Mark Bourne, Private Bag 92 52,1 Wellesley Street, Auckland 1141

Plan Section	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
3.11.1	PC1-8341	Oppose	<p>The amendment to include a new values table that relates solely to municipal processes is opposed as it does not promote sustainable management and the other values already included encompass the relief sought.</p> <p>The reference to the rivers’ assimilative capacity for discharges from municipal waste and activities is opposed as it does not recognise the assimilative capacity of the land within the catchment and the potential for land based discharge. The amendment does not promote sustainable management.</p>	DISALLOW

FURTHER SUBMISSION POINTS TO VARIATION 1

By Consultation Point

General

Submitter and ID	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated	V1PC1-778	Oppose	Insofar as the submission relates to the previously withdrawn portion, the	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Farmers of New Zealand 74191			amendment does not promote sustainable management.	
Federated Farmers of New Zealand 74191	V1PC1-1500	Oppose	The “fundamental principle of natural justice” that the submitter relies upon is directly contrary to Schedule 1 of the RMA. The submission fails to recognise that the scope of the Variation is limited to previously withdrawn portion and the associated consultation process and does not apply to the entire Region.	DISALLOW
Fonterra Co-operative Group Ltd 74057	V1PC1-801	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendment does not promote sustainable management.	DISALLOW

Area covered by Chapter 3.11

Submitter and ID	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated Farmers of New Zealand 74191	V1PC1-93	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendment does not promote sustainable management.	DISALLOW
Department of Conservation 71759	V1PC1-1139	Support	The submission promotes sustainable management.	ALLOW

Intrinsic Values – Ancestry and History

Submitter and ID	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Waikato and Waipa River Iwi 32023	V1PC1-74035	Support	The amendments promote sustainable management.	ALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

3.11.2 Mana Tangata – use values

Submitter and ID	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Watercare Services Ltd 74077	V1PC1-890	Oppose	The reference to the rivers' assimilative capacity for discharges from municipal waste and activities is opposed as it does not recognise the assimilative capacity of the land within the catchment and the potential for land based discharge. The amendment does not promote sustainable management.	DISALLOW

Water supply

Submitter and ID	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Waeranga Partnership 32023	V1PC1-593	Oppose	Reasons above under PC1-10152.	DISALLOW

Use values – Commercial, municipal and industrial use

Submitter and ID	Submission point ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Waeranga Partnership 32023	V1PC1-592	Oppose	Reasons above under PC1-10152.	DISALLOW

3.11.2 Objectives

Submitter and ID	Submission	Support or oppose	Reasons for support or opposition of submission	Decision sought (allow or disallow)
------------------	------------	-------------------	---	-------------------------------------



Statutory managers of freshwater sports fish, gamebirds and their habitats.

	point ID	submission		disallow)
Department of Conservation 71759	V1PC1-997	Support	Promotes sustainable management.	ALLOW
Department of Conservation 71759	V1PC1-1701	Support	Promotes sustainable management.	ALLOW

Reasons for Adopting Objectives 1, 2, 3, 4, 5, and 6.

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated Farmers of New Zealand 74191	V1PC1-156 (Reason for Objective 1) V1PC1-157 (Reason for Objective 2) V1PC1-158 (Reason for Objective 3) V1PC1-159 (Reason for Objective 4) V1PC1-160 (Reason for Objective 5) V1PC1-161 (Reason for	Oppose	Insofar as the submissions relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW amendments sought



Statutory managers of freshwater sports fish, gamebirds and their habitats.

	Objective 6)			
--	--------------	--	--	--

3.11.3 Policies

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated Farmers of New Zealand 74191	V1PC1-172	Oppose	Insofar as the submissions relate to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW
Federated Farmers of New Zealand 74191	V1PC1-175	Oppose	Insofar as the submissions relate to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW
Federated Farmers of New Zealand 74191	V1PC1-240	Oppose	Insofar as the submissions relate to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW

Policy 2

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated Farmers of New Zealand 74191	V1PC1-164	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW amendments sought
Fonterra Co-operative Group Ltd	V1PC1-1630	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

74057				
Fonterra Co-operative Group Ltd 74057	V1PC1-755	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW

Policy 3

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated Farmers of New Zealand 74191	V1PC1-176	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW amendments sought

Policy 6

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated Farmers of New Zealand 74191	V1PC1-194	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW amendments sought

Policy 7

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated Farmers of New	V1PC1-224	Oppose	Insofar as the submission relates to the previously withdrawn portion, the	DISALLOW amendments sought



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Zealand 74191			amendments do not promote sustainable management.	
-------------------------	--	--	---	--

Policy 15

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Department of Conservation 71759	V1PC1-405	Support	Promotes sustainable management.	ALLOW

3.11.5 Implementation methods

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated Farmers of New Zealand 74191	V1PC1-290	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW
Federated Farmers of New Zealand 74191	V1PC1-314	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW amendments sought

3.11.4.8

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Federated Farmers of New Zealand 74191	V1PC1-300	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW
--	-----------	--------	--	----------

3.11.4.12

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated Farmers of New Zealand 74191	V1PC1-312	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW

3.11.5

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated Farmers of New Zealand 74191	V1PC1-499	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW
Federated Farmers of New Zealand 74191	V1PC1-570	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW
Federated Farmers of New Zealand 74191	V1PC1-571	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW



Statutory managers of freshwater sports fish, gamebirds and their habitats.

3.11.5.5

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated Farmers of New Zealand 74191	V1PC1-498	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW

Additions to Glossary of Terms

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
Federated Farmers of New Zealand 74191	V1PC1-802	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW
Federated Farmers of New Zealand 74191	V1PC1-811	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW

Definition – Setback

Submitter and ID	Submission point(s) ID	Support or oppose submission	Reasons for support or opposition of submission	Decision sought (allow or disallow)
------------------	------------------------	------------------------------	---	-------------------------------------



Statutory managers of freshwater sports fish, gamebirds and their habitats.

Federated Farmers of New Zealand 74191	V1PC1-808	Oppose	Insofar as the submission relates to the previously withdrawn portion, the amendments do not promote sustainable management.	DISALLOW
--	-----------	--------	--	----------