



FURTHER SUBMISSION

17 SEPTEMBER 2018

TO

WAIKATO REGIONAL COUNCIL

FURTHER SUBMISSION ON

**Proposed Waikato Regional Plan Change 1 &
Variation 1 to the Proposed Waikato Regional
Plan Change 1 – Waikato and Waipa River
Catchments**

BY

Beef + Lamb New Zealand Ltd

FURTHER SUBMISSION TO WAIKATO REIGONAL COUNCIL ON THE WAIKATO REGIONAL COUNCIL PROPOSED PLAN CHANGE 1 & VARIATION 1 – WAIKATO AND WAIPA RIVER CATCHMENTS

Submission on publicly notified proposal for policy statement or plan
Clause 6 of First Schedule, Resource Management Act 1991

To: The Chief Executive & Science and Strategy - Policy
Waikato Regional Council
Private Bay 3038
Waikato Mail Centre
Hamilton 3240

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Beef + Lamb New Zealand Limited could not gain an advantage in trade competition through this further submission.

Beef + Lamb New Zealand (B+LNZ) is making this Further Submission because, as the industry good organisation representing New Zealand's sheep and beef farmers, it has an interest in this Plan Change process which is greater than the general public interest.

The specific provisions of the proposal that Beef + Lamb NZ Ltd further submission relates to and the decisions it seeks from Council are as detailed on the following pages. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

Beef + Lamb New Zealand wishes to be heard in support of its Further Submission and, is willing to consider presenting a joint case at hearing with other submitters addressing similar issues.

I can confirm that I am authorised to make this Further Submission on Beef + Lamb New Zealand's behalf and, that copies will be served on the persons who made the original submissions to which it relates within 5 working days of today's date.

Victoria Lamb
Acting Environment Strategy Manager
Beef + Lamb New Zealand Ltd



17 September 2018

1. Beef + Lamb New Zealand Further Submissions on PC1 & Variation 1A

1.1 For the avoidance of doubt, B+LNZ does not resile from the decisions sought in its original submissions made on PC1 and Variation 1. These further submissions are in addition to the original submission points made on PC1 and the Variation.

1.2 The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the Plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Aston, Lucy #73020 & Aston, Penelope #73811	Policy 2 #PC1 – 7123, 12685, 12686, 12687, & PC1 – 12688 #PC1 – 5361, 12689, 12690, 12691	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed.
	Rule 3.11.5.1 #PC1 – 7032 #PC1 - 5342	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed.

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
	Rule 3.11.5.4 #PC1 – 7065 #PC1 - 5365	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed.
	Rule 3.11.5.6 # PC1 – 12982, 12983, 12984, & PC1 – 7129 #PC1 – 12985, 5359	Support	Submission is generally consistent with the key points and intent of the submission of B+LNZ	Submission should be allowed.
	Schedule B #PC1 – 7128 # PC1 - 5373	Support	Submission is generally consistent with the key points and intent of the submission of B+LNZ	Submission should be allowed.
	Schedule C #PC1 – 7118 # PC1 - 5385	Support	Submission is generally consistent with the key points and intent of the submission of B+LNZ	Submission should be allowed.

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
	<p>Schedule 1</p> <p>PC1 – 7125, 12340, 12341, & PC1 – 12342</p> <p># PC1 – 5389, 12346, 12343, 2344, 12345</p>	Support	Submission is generally consistent with the key points and intent of the submission of B+LNZ	Submission should be allowed.
	<p>Table 3.11-1</p> <p>#PC1 – 6995</p> <p>#PC1 - 5311</p>	Support	<p>Submitter sought that Table 3.11-1 be amended so that the numerical targets do not apply during flood events.</p> <p>Submission is generally consistent with the key points and intent of the submission of B+LNZ</p>	Submission should be allowed insofar as it is consistent with the submission of B+LNZ
<p>Bailey, James</p> <p>#73926</p>	The submission in its entirety	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed.
<p>Farmers 4 Positive Change (F4PC)</p> <p>#73355</p>	The submission in its entirety	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed.

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPOSE	REASON	RELIEF SOUGHT
Federated Farmers of New Zealand #74191	General #PC1 - 10862	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed.
	Policy 1 #PC1 - 10815	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed
	Policy 2 #PC1 - 12754	Support	Relief sought is appropriate to ensure consent duration provides certainty for periods reflective of the level of investment of the consent holder in relation to environment mitigation.	Submission should be allowed
	Policy 2 & Schedule C Stock Exclusion #PC1 – 12755 & PC1 - 10852	Support	Submitter sought that Policy 2 (e) and Schedule C be amended to give effect to the 'Keeping stock out of our waterways' provisions of the government's Clean Water Package 2017, which is supported by B+LNZ.	Submission should be allowed
	Policy 2 & Policy 6 #PC1 – 10816 & PC1 - 10822	Support with amendment	Submission is generally consistent with the key issues and relief sought in B+LNZs submission in relation to ensuring that management frameworks are effect based and regulatory intervention is consistent to the scale and magnitude of risk posed by an activity.	Submission should be allowed with amendments

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
			<p>Federated Farmers proposed a threshold of 15kgN/ha/yr to designate low intensity land use. A threshold of 15kgN/ha/yr may be less than that appropriate to manage risk in relation to low intensity land uses (15kgN/ha/yr – 20kgN/ha/yr).</p> <p>Data from the sheep and beef sector shows that sheep and beef farming systems which are optimised within environmental limits have an average Nitrogen discharge profile of 18kgN/ha/yr, or specific to each farm class which is reflective of geology, soil, and climate, the following nitrogen discharge profile:</p> <ul style="list-style-type: none"> • Farm class 3 Hard Hill Country 15kgN/ha/yr (LUC VI, VII, VIII); • Farm Class 4 Hill Country 18kgN/ha/yr (LUC IV, V, VI); and • Farm Class 5 Finishing 21kgN/ha/yr (LUC I, II, III, IV). 	
	<p>Rules 3.11.5 #PC1 - 10844</p>	<p>Support with amendment</p>	<p>Submitter sought that the rules be amended:</p> <ul style="list-style-type: none"> • to bring them into alignment with the Policies and Methods in PPC1, as sought to be amended by the submissions made herein, and subject also to additional refinement through the further submissions process; • Add a new rule to PPC1 to implement the policy of providing an exemption from Farm Environment Plans and Certified Industry Schemes for those emitting less than 15KgN/ha; • Delete Rule 3.11.5.2 (4) (c); • Add a new permitted activity rule to read: "The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that: 	<p>Submission should be allowed with amendments</p>

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
			<p>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or 2) The change in the numbers of breeding cattle, deer, pigs or horses does not exceed 15% of the numbers used to establish the Nitrogen Reference Point; or 3) The change in the numbers of trading cattle, deer, pigs or horses does not exceed 15% of the numbers used to establish the Nitrogen Reference Point."</p> <ul style="list-style-type: none"> Amend PPC1 so that normal farming activities in rural areas are permitted activities. Amend PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities. <p>Submission is generally consistent with the key issues and relief sought in B+LNZ submission in relation to ensuring that management frameworks are effect based and regulatory intervention is consistent to the scale and magnitude of risk posed by an activity.</p> <p>Federated Farmers proposed a threshold of 15kgN/ha/yr to designate low intensity land use. A threshold of 15kgN/ha/yr may be less than that appropriate to manage risk in relation to low intensity land uses (15kgN/ha/yr – 20kgN/ha/yr).</p> <p>Data from sheep and beef sector shows that sheep and beef farming systems optimised within environmental limits have an average N discharge profile of 17kgN/ha/yr, or for each farm class which is reflective of geology, soil, and climate:</p> <ul style="list-style-type: none"> Farm Class 3 Hard Hill Country 15kgN/ha/yr (LUC VI, VII, VIII) 	

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPOSE	REASON	RELIEF SOUGHT
			<ul style="list-style-type: none"> • Farm Class 4 Hill Country 18kgN/ha/yr (LUC IV, V, VI); and • Farm Class 5 Finishing 21kgN/ha/yr (LUC I, II, III, IV) 	
	General & Schedule 1 or new schedule #V1PC1-778 & V1PC1 - 766	Support with amendments	Submitter seeks inclusion of a simplified FEP provision which represents a more efficient and effective method in managing agricultural land uses, relative to the magnitude and scale of potential adverse effects on water quality from these activities.	Submission should be allowed with amendments as shown in appendix 1 which are reflective of the relief sought by B+LNZ on PC1 and in consideration of Federated Farmers submission point V1PC1 – 778
	Objective 4 #V1PC1 - 143	Support	Submitter seeks inclusion of a new clause paragraph (d) to Objective 4 to read: 'd. recognising and providing for flexibility in the implementation of on-farm management measures to respond to changes brought about by climatic events, natural hazards, economic conditions, health and safety, and animal welfare requirements.'	Submission should be allowed
	3.11.3 Policies #V1PC1 - 172	Support	Submitter seeks inclusion of a new policy which recognises that approaches to farm environment planning, and methods to avoid, remedy, or mitigate effects on freshwater, are the most efficient and effective when they are: <ul style="list-style-type: none"> • Tailored to the farm and its unique natural capital stocks (natural assets); • Tailored to the aspirations and circumstances of the owners and land managers; • Flexible; • Innovative; • Adaptive; 	B+LNZ seeks that the submission be allowed.

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
			<ul style="list-style-type: none"> Responsive to changes in markets, environment, and personal circumstances of the owner / operators; and Integrative and holistic (biodiversity, climate change, animal welfare) <p>B+LNZ supports the submission because it is generally consistent with the key points made by B+LNZ in its own submissions</p>	
	3.11.3 Policies #V1PC1 - 240	Support in part	<p>Submitter seeks inclusion of a new policy: 'Policy 12 A: Additional considerations for diffuse discharges in relation to water quality targets. Policy includes consideration of:</p> <ul style="list-style-type: none"> the characteristics of the sub-catchment within which the subject farm enterprise is located as set out in the Catchment Profile and any sub-catchment management plan (including load reductions achieved through whole of sub catchment actions); and the relative contribution of the industry sector within which the farming enterprise belongs to the likely achievement of the short term targets in Objective 3 or the progression towards the outcomes anticipated by the Vision and Strategy and values in Objective 1; and the resources reasonably available to the farm enterprise; and investment in the past on farm and edge of field contaminant mitigations including technology upgrades to model, monitor and reduce the discharge of nitrogen, phosphorus, sediment and microbial pathogens where those mitigations are already achieving a high level of contaminant reduction through the application of the Most Practicable Action.' 	B+LNZ seeks that the submission be allowed, insofar that is consistent with B+LNZ submissions

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
	Policy 11 #V1PC1 - 236	Support with amendments	Submitter seeks that the policy be applied to both point source discharges and diffuse discharges including requirements to adopt the best practicable option ¹ (or most practicable option). Amendments are supported as they provide equity in relation to how point source discharges and diffuse discharges are managed through the proposed plan, and are reflective of the requirements of section 70 RMA.	B+LNZ seeks that the submission be allowed, insofar that is consistent with B+LNZ submissions
	3.11.4 Implementation methods #V1PC1 - 290	Support	Submitter seeks inclusion of a new method to ensure that catchment profiles are available to inform catchment/ sub catchment approaches to managing land use and freshwater ecosystem health. Submission is consistent with that of B+LNZ	B+LNZ seeks that the submission be allowed
	3.11.4.5 #V1PC1 - 266	Support	Submitter seeks amendments to provisions to strengthen sub catchment approaches to management of land use to achieve catchment specific objectives for aquatic ecosystem health. Intent is consistent with B+LNZ submissions	B+LNZ seeks that the submission be allowed, insofar that is consistent with B+LNZ submissions

¹ Best Practicable Option, in relation to a discharge of a contaminant or an emission of noise, means the best method for preventing or minimising the adverse effects on the environment having regard, among other things, to— (a) the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and (b) the financial implications, and the effects on the environment, of that option when compared with other options; and (c) the current state of technical knowledge and the likelihood that the option can be successfully applied.

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
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	3.11.5.1 V1PC1 - 327	Support with amendments	<p>Submitter sought amendments to provide for inclusion of a reasonable stocking rate that adequately addresses likely water quality risks while providing for low intensity farms to operate under Rule 3.11.5.1.</p> <p>Submission is consistent with B+LNZ insofar that amendments are sought to ensure that provision is made for low intensity land uses.</p> <p>B+LNZ seek either SU or N discharge thresholds be applied consistent with B+LNZ submission. Data from sheep and beef sector shows that sheep and beef farming systems optimised within environmental limits are operating at around 12 – 14SU/ha, have an average N discharge profile of 17kgN/ha/yr, or for each farm class which is reflective of geology, soil, and climate has the following discharge profile:</p> <ul style="list-style-type: none"> • Farm class 3 Hard Hill Country 15kgN/ha/yr (LUC VI, VII, VIII); • Farm Class 4 Hill Country 18kgN/ha/yr (LUC IV, V, VI); and • Farm Class 5 Finishing 21kgN/ha/yr (LUC I, II, III, IV). 	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions.
Gleeson, Graeme B #73800	Submission in its entirety	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed insofar as it is consistent with the submission of B+LNZ
Hamilton, Malibu #74083	General #PC1 - 9854	Support with amendments	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed insofar as it is consistent with the submission of B+LNZ

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
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	Rule 3.11.5.1 & 3.11.5.2 #PC1 – 10299 & PC1 - 10300	Support	Submitter sought that Rule 3.11.5.1 be amended to ensure that it complies with Section 70 RMA. Submission is consistent with B+LNZ submission. B+LNZ support inclusion of: <u>any associated discharge or diversion does not give rise to any of the following effects in the receiving waters beyond the zone of reasonable mixing:</u> <ol style="list-style-type: none"> <u>any conspicuous change in colour or visual clarity, or</u> <u>rendering fresh water unsuitable for consumption by farm animals, or</u> <u>any significant adverse effects on aquatic life</u> 	Submission should be allowed insofar as it is consistent with the submission of B+LNZ
	Schedule B # PC1 - 10363	Support	Submitter sought that PPC1 be amended so that the nitrogen leaching allocation is based on Land Use Capability and suitability [more detail provided in the submission about how this could be done] Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed insofar as it is consistent with the submission of B+LNZ
Hill Country Farmers Group #73321	Submission in its entirety	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
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Horticulture New Zealand (HortNZ) #73801	Objective 3 & Objective 4 #PC1 – 9945 & V1PC1 – 1624 #PC1 – 10005 & V1PC1 - 1602	Support with amendments	For the purpose of this relief the submitter has produced a 10-year Sub-catchment Load Target Table (Schedule 1C Table XX) and attached it to proposed relief as part of a new Schedule 1C. As an alternative where it is mentioned in this submission, it could be inserted as a new part of Table 3.11-1. B+LNZ support the inclusion of load limits or targets within PC1, and management approaches which support and empower sub catchment management frameworks	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions.
	Policy 9 #PC1 – 10078 & V1PC1 – 892 & V1PC1 - 1634	Support with amendments	B+LNZ support inclusion of new provisions and/or amendments to existing provisions which have the effect of supporting and empowering sub catchment management frameworks, which are the most efficient and effective approach for managing land use activities in an integrated and holistic manner, targeted to maintaining and where degraded improving the health of freshwater in receiving waterbodies.	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions.
	3.11.4.5 Sub catchment scale planning #PC1 - 10108&V1PC1 - 1636	Support with amendments	B+LNZ support inclusion of new provisions and/or amendments to existing provisions which have the effect of supporting and empowering sub catchment management frameworks, and collaboration between stakeholders.	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions.
	3.11.5 Rule	Support	B+LNZ support inclusion of new provisions and/or amendments to existing provisions which have the effect of supporting and	Submission should be allowed insofar as this would be consistent

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		SUPPORT / OPOSE	REASON	RELIEF SOUGHT
	#PC1 – 10162 & V1PC1 - 1614		empowering sub catchment management frameworks, and collaboration between stakeholders.	with the specific decisions sought by B+LNZ in its own submissions.
	Schedule 1 #PC1 – 10215 & V1PC1 - 1641	Support	B+LNZ support inclusion of new provisions and/or amendments to existing provisions which have the effect of supporting and empowering sub catchment management frameworks, and collaboration between stakeholders.	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions.
	New Definition for Catchment Collective #PC1 - 10227	Support	B+LNZ support inclusion of new provisions and/or amendments to existing provisions which have the effect of supporting and empowering sub catchment management frameworks, and collaboration between stakeholders.	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions.
	Definition Enterprise #PC1 – 10232 & V1PC1 - 1644	Support	To enable primary production management units (be they landholdings or activities such as horticulture) to be aggregated and managed as one parcel.	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions.
Lawson, John	General #PC1 - 11228	Support in part	Submitter sought: <ul style="list-style-type: none"> Amend PPC1 by setting bottom lines and targets using the National Policy Statement for Freshwater Management; Amend PPC1 to set timeframes for adjustments required in land use and discharge of contaminants appropriate to each case; and 	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions.

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
			<ul style="list-style-type: none"> Amend where significant adjustment times are required; Amend PPC1 by providing a threshold-setting process identifies thresholds in sub-catchments and catchments coming under resource use pressure; Amend to ensure the threshold-setting process recognises spatial variation and the interactions between contaminants and takes into account the following: The size of the resource, proportion of the limit that is being used, current and expected rate of uptake of the remaining portion of the limit, likely scale and extent of unmet demand, historic inputs, persistence of contaminants in the environment and lag times; Amend PPC1 to determine the outcomes required to safeguard life-supporting capacity and the ecosystem health of freshwater to maintain or enhance water quality (where a freshwater limit is met); Amend PPC1 by including numeric limits, timeframes and targets for benthic sediment attributes in the catchment. <p>Submission is in part consistent with the key points made by B+LNZ in its own submissions.</p>	
Lea, Charles Steven #73903	Rule 3.11.5.1 #PC1 - 3544	Support	Submitter sought that Rule 3.11.5.1 be amended such that the 25 degrees slope standard is replaced with a stocking rate of over 18 stock units per hectare. Submission is generally consistent with the key points made by B+LNZ in its own submissions in relation to determining the threshold for low intensity land and as a measure of risk.	Submission should be Allowed.

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPOUSE	REASON	RELIEF SOUGHT
	<p>Rules 3.11.5.2, 3.11.5.4 & 3.11.5.7</p> <p>#PC1 – 3547, PC1 – 3548 & PC1 - 3555</p>	Support	<p>Submitter sought that Rule 3.11.5.3 be amended such that</p> <ul style="list-style-type: none"> the 25 degrees slope standard is replaced with a stocking rate of over 18 stock units per hectare. use Olsen Phosphorus from soil tests as an indicator of nutrient use efficiency and loss risk the OVERSEER Model is more tailored to each farm adopt a sub-catchment approach; natural capital, land class not grandparenting NRP is used as the tool; and delete the Nitrogen Reference Point and requirements for farmers to be held at or below their Nitrogen Reference Point. <p>Submission is generally consistent with the key points made by B+LNZ in its own submissions</p>	Submission should be allowed.
	<p>Rules 3.11.5.6</p> <p>#PC1 – 13049 to PC1 - 3551</p>	Support	<p>Submitter sought that Rule 3.11.5.6 be amended:</p> <ul style="list-style-type: none"> so that it relates to the land's natural capital (land soil types) and its productive potential; Nitrogen Reference Point and requirements for farmers to be held at or below their nitrogen Reference Point is deleted; the 25 degrees slope standard is removed and replaced with a stocking rate of over 18 stock units per hectare. 	Submission should be allowed.

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPOSE	REASON	RELIEF SOUGHT
			Submission is generally consistent with the key points made by B+LNZ in its own submissions in relation to ensuring that regulatory intervention is risk and effects based.	
	Schedule B - Nitrogen Reference Point PC1-3566	Support	<p>Submitter sought that Schedule B be amended:</p> <ul style="list-style-type: none"> • use Olsen Phosphorus from soil tests as an indicator of nutrient loss risk; • so that the OVERSEER Model is more tailored to each farm; • adopt a sub-catchment approach; • to use natural capital, land class not grandparenting as the tool for managing nitrogen loss risk and interim allocation; and • that the Nitrogen Reference Point and requirements for farmers to be held at or below their nitrogen Reference Point be deleted. <p>Submission is generally consistent with the key points made by B+LNZ in its own submissions</p>	Submission should be allowed.
	Schedule C - Stock exclusion PC1-3541	Support	<p>Submitter sought that:</p> <ul style="list-style-type: none"> • the 25 degrees slope standard in Schedule C be replaced with a stocking rate of over 18 stock units per hectare. <p>Submission is generally consistent with the key points made by B+LNZ in its own submissions in relation to ensuring regulatory intervention is risk and effects based</p>	Submission should be allowed.

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPOUSE	REASON	RELIEF SOUGHT
Lee, Malcolm and Sally #72932	Submission in its entirety	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions	Submission should be allowed
	Policy 2 & Schedule 1 #PC1 – 12819 & PC1 - 12448	Support with amendments	Submitter sought that Policy 2 be amended to: <ul style="list-style-type: none"> • to provide for a template to allow farmers to work and prepare their own Farm Environment Plans; • to focus on mitigation rather than rules • to reconsider the level of impact on smaller areas of adverse events • provide for more flexibility in Farm Environment Plans for small local adverse events; and • make any consequential amendments arising from the submission process. 	Submission should be allowed with amendment to enable industry Farm Environment Plan/ or Land Environment Plans to be used to give effect to the requirements of Schedule 1.
New Zealand Association of Resource Managers (NZARM) #71702	Schedule 1 & Definition Certified Farm Environment Planner #PC1 – 7991 & PC1 - 7993	Support	Submitter highlights the importance of farm/ paddock scale land use capability (LUC) mapping to underpin robust farm environment planning carried out at a paddock-scale (1:10,000 mapping scale) versus available resource information (1:50,000 mapping scale), including linking land use, stock policies, and management to the underlying natural capability of the land. As such the submitter supports provisions which require LUC mapping, and seeks amendments to ensure that farm environment planners have the necessary skills and expertise to ensure these requirements are being meet.	Submission should be allowed. Land use capability mapping to remain an essential element in tailored farm environment plans, supported by appropriately qualified and skilled providers.

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		SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Pamu Farms of New Zealand #74000	Schedule B #PC1 - 5849	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed
Stokman, Mark & Sharon #73976	Submission in its entirety	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed
Storey, Campbell Grant #73281	Submission in its entirety #PC1 – 6506 & PC1 - 6504	Support	<p>Submitter sought that PPC1 be amended to:</p> <ul style="list-style-type: none"> • extend the 10 year tenure of PPC; and • provide certainty around what further changes are planned and what their impacts will be; and • Amend Schedule B so everyone has the same nitrogen limit and is contributing equally to the changes required to improve waterways. For example, if the limit is X, then those below X can increase and those above can decrease; and <p>Submission is generally consistent with the key points made by B+LNZ in its own submissions, in particular the provision of certainty for farmers in the longer term so that they can make investment and business decisions, and equity in any nitrogen allocation or interim allocation framework.</p>	Submission should be allowed

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPOSE	REASON	RELIEF SOUGHT
Wairaki Pastoral #74095	General #PC1 - 11406	Support	B+LNZ support inclusion of new provisions and/or amendments to existing provisions which have the effect of supporting and empowering sub catchment management frameworks, which are the most efficient and effective approach for managing land use activities in an integrated and holistic manner, targeted to maintaining and where degraded improving the health of freshwater in receiving waterbodies.	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions.
	Policy 1 #PC1 - 11272	Support in part	B+LNZ support inclusion of new provisions and/or amendments to existing provisions which have the effect of supporting and empowering sub catchment management frameworks, which are the most efficient and effective approach for managing land use activities in an integrated and holistic manner, targeted to maintaining and where degraded improving the health of freshwater in receiving waterbodies.	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions.
	Policy 2 #PC1 - 12956	Support in part	B+LNZ support inclusion of new provisions and/or amendments to existing provisions which have the effect of supporting and empowering sub catchment management frameworks, which are the most efficient and effective approach for managing land use activities in an integrated and holistic manner, targeted to maintaining and where degraded improving the health of freshwater in receiving waterbodies.	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions.
	Policy 9 #PC1 - 11349	Support in part	B+LNZ support inclusion of new provisions and/or amendments to existing provisions which have the effect of supporting and empowering sub catchment management frameworks, which are the most efficient and effective approach for managing land use activities in an integrated and holistic manner, targeted to	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
			maintaining and where degraded improving the health of freshwater in receiving waterbodies.	
	Policy 11 #PC1 - 11351	Support with amendments	Submitter seeks that the policy be applied to both point source discharges and diffuse discharges including requirements to adopt the best practicable option ² (or most practicable option). Amendments are supported as they provide equity in relation to how point source discharges and diffuse discharges are managed through the proposed plan, and are reflective of the requirements of section 70 RMA.	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions
	3.11.4.5	Support with amendments	B+LNZ support inclusion of new provisions and/or amendments to existing provisions which have the effect of supporting and empowering sub catchment management frameworks, which are the most efficient and effective approach for managing land use activities in an integrated and holistic manner, and which are targeted to maintaining and where degraded improving the health of freshwater in receiving waterbodies.	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions

² Best Practicable Option, in relation to a discharge of a contaminant or an emission of noise, means the best method for preventing or minimising the adverse effects on the environment having regard, among other things, to— (a) the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and (b) the financial implications, and the effects on the environment, of that option when compared with other options; and (c) the current state of technical knowledge and the likelihood that the option can be successfully applied.

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Waikato Regional Council to make is:
		SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
	3.11.5.6 #PC1 - 11378	Support in part	B+LNZ support inclusion of new provisions and/or amendments to existing provisions which have the effect of supporting and empowering sub catchment management frameworks, which are the most efficient and effective approach for managing land use activities in an integrated and holistic manner, and which are targeted to maintaining and where degraded improving the health of freshwater in receiving waterbodies.	Submission should be allowed insofar as this would be consistent with the specific decisions sought by B+LNZ in its own submissions
Waikato and Waipa branches of the New Zealand Deer Federation Association #74008	The submission in its entirety	Support	Submission is generally consistent with the key points made by B+LNZ in its own submissions.	Submission should be allowed.

2. Conclusion

- 2.1 B+LNZ thanks the Waikato Regional Council for the opportunity to comment on proposed Waikato Regional Plan Change 1.
- 2.2 B+LNZ would not gain an advantage in trade competition through this submission.
- 2.3 B+LNZ wishes to be heard **in support of this further submission and is happy to discuss the issues raised in this submission.**
- 2.4 B+LNZ would consider presenting a joint case with other parties who have made similar submissions.

Signed



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17 September 2018

3. Appendix 1 – Simplified Farm Environment Management Plan Requirements

Part A - Farm Environment Plans (FEP) can be based on either of:

1. The material set out under Part B below; or
2. Industry prepared farm or land environment plan templates and guidance material, with Waikato specific supplementary material added where relevant, so that it includes the material set out in Part B below, and for clauses (1), and (2) is
3. reviewed at least once every 12 months by the landholding owner or their agent and the outcome of the review is documented; and
4. provided to the Waikato Regional Council upon request.

Part B – Farm Environment Management Plan Content

1. The following landholding details:
 - a. physical address; and
 - b. description of the landholding ownership and the owner's contact details; and
 - c. legal description(s) of the landholding; and
 - d. a list of all resource consents held for the landholding and their expiry dates.
2. The following map(s) or aerial photograph(s) of the landholding at a scale that clearly shows the locations of:
 - a. the boundaries; and
 - b. land management units and land use capability units; and
 - c. Identification of gully, landslide and earthflow erosion within the farm boundary; and
 - d. slope contours; and
 - e. soil types, and
 - f. Natural wetlands, lakes, permanently flowing river(s) or stream(s), or permanently flowing artificial watercourse; and
 - g. all known subsurface drainage system(s) and the locations of the drain outlets; and
 - h. Areas of indigenous vegetation; and
 - i. Wāhi tapu sites; and
 - j. Critical Source Areas³ including ephemeral waterbodies; and
 - k. soil types; and
 - l. all existing and proposed riparian vegetation; and
 - m. all existing or proposed fences (or other stock exclusion methods) adjacent to waterbodies; and
 - n. places where stock access or cross water bodies (including bridges, culverts and fords); and
 - o. all proposed areas for land preparation including cultivation over the next 12-month period; and
 - p. all proposed earthwork areas over the next 12 month period; and

³ Critical Source Areas are defined as is a landscape feature like a gully, swale or a depression that accumulates runoff from an adjacent immediate area, and delivers it to surface waterways such as rivers and lakes, artificial waterways and field tiles; and areas which arise through land use activities and management approaches such as tracks, yards, offal pits, land preparation, stock camps, and intensive winter grazing, which result in contaminants being discharged from the area or activity and being delivered to surface waterways.

- q. all land that may be intensively winter grazed (1 May to 30 September)

3. Best Practicable Option⁴:

- a. For each land management unit or/and land use capability unit a list of their vulnerabilities and limitations; and
- b. The location, timing and prioritisation of measures to control or mitigate erosion, and sediment loss from the landholding; and
- c. Identification of measures to avoid, remedy, or mitigate the effects of pastoral land use on Rivers, Lakes, and natural wetlands, including timeframes for implementation; including
- d. the good management practices which will be undertaken over the coming 12-month period. These must include practices for:
 - i. the reduction of sediment, nutrient, and faecal losses from critical source areas, particularly those associated with overland flow;
 - ii. land preparation (including practices such as contour ploughing, strip cultivation or direct drilling);
 - iii. the use of land for intensive winter grazing;
 - iv. riparian areas (including those from which stock are excluded), extent, and the type of riparian vegetation including to be planted, how it will be maintained and how weeds will be controlled;
 - v. avoiding or minimising discharges of contaminants to surface water or groundwater, with particular reference to the contaminant pathways identified for the landholding; and
 - vi. Management, including as appropriate enhancement, and protection of areas of indigenous vegetation; and
- e. areas of the landholding to be retired from pastoral land use; and
- f. The extent to which livestock can be effectively excluded from the bed of a waterbody or permanently flowing watercourse, natural wetland, lake, or coastal marine area; and the
- g. methods, extent, and timing of effective exclusion of livestock from the bed of a waterbody or permanently flowing watercourse, natural wetland, lake, or coastal marine area; and
- h. Evidence to support the recommendations in item (b) to (g) above; including but not limited to:
 - i. The effectiveness of measures to control or mitigate erosion and sediment loss from the landholding; and
 - ii. The effectiveness of measures to control or mitigate losses of sediment, phosphorus, nitrogen and faecal material from critical source areas.

Examples of general good management practices are provided on the DairyNZ and Beef and Lamb New Zealand websites and in the document titled “Good Farming Practice Action Plan for Water Quality, 2018”.

⁴ Best Practicable Option may include good management principals. Examples of general good management practices are provided on the DairyNZ and Beef and Lamb New Zealand websites and in the document titled “Good Farming Practice Action Plan for Water Quality, 2018”.