



Department of  
Conservation  
*Te Papa Atawhai*

Further Submission by

The Director-General of Conservation

on the

Proposed Waikato Regional Plan Change 1  
pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

**To:** Waikato Regional Council  
Private Bag 3038  
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Hamilton 3240  
healthyivers@waikatoregion.govt.nz

**Further Submission from:** The Director-General of Conservation

**Further Submission on:** Proposed Waikato Regional Plan Change 1 notified on 10 April 2018.

**Provisions the submission relates to:** The topics of submission, the Director-General of Conservation support or oppose and any relief sought are contained in detail on the following pages.

**Status as further submitter:** I consider that I represent a relevant aspect of the public interest, have an interest greater than the interest that the general public has, and may therefore make further submissions in accordance with clause 8, Schedule 1, RMA.

The Director-General of Conservation is the administrative head of the Department of Conservation. The statutory functions of the Department under s6 of the Conservation Act 1987 include:

- managing for conservation purposes all land and other natural and historic resources held under the Conservation Act;
- preserving so far as practicable all indigenous freshwater fisheries and protect recreational freshwater fisheries and freshwater fish habitats; and
- advocating for the conservation of natural and historic resources generally.

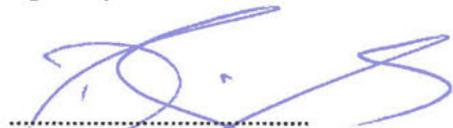
In addition, the Director-General of Conservation has functions under the Wildlife Act 1953 and the Freshwater Fisheries Regulations 1983 with regard to fish passage.

The Director-General of Conservation is also the constitutional adviser to the Minister of Conservation who is responsible for monitoring the effect and implementation of the NZCPS 2010 (s28(e) RMA). The Department of Conservation administers public conservation lands throughout the District.

**Hearing:**

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

Signed by:



David Speirs  
Operations Director (Hauraki, Waikato, Taranaki)  
Director-General of Conservation  
Signed on behalf of the Director-General of  
Conservation pursuant to an instrument of delegation.

A copy of the instrument of delegation may be inspected at the Director-General's office.

**Date:** 17 September 2018

**Address for service:**

Michelle Lewis  
RMA Team Leader  
Department of Conservation  
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Hamilton 3240  
Email: [milewis@doc.govt.nz](mailto:milewis@doc.govt.nz)

## 1. Further submission table

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
Water quality and National Policy Statement for Freshwater Management	PC1-11255	Fonterra ID74057	AND ADD to the Water Quality and National Policy Statement for Freshwater Management Section (page 14) a final sentence at the end that reads: " <u>For the avoidance of doubt, for the purpose of the National Policy Statement for Freshwater Management, the freshwater objective of this plan is Objective 3.</u> "	Oppose	It is not clear what the freshwater objectives of the Proposed Plan Change are and further clarification is sought through the Director-General's original submission.	I seek that this part of the submission be disallowed.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-10471 V1PC1-1348	Fonterra ID74057	AND ADD a NEW Policy 4A to read: " <u>Policy 4A: Signalling further change by lower discharging activities may be required in the future. Recognise that lower discharging activities may need to take additional mitigation actions to reduce diffuse discharges or nitrogen, phosphorus, sediment and microbial pathogens after 2026 in order for Objective 1 to be met.</u> "  AND ADD a NEW Policy 4AB to read: " <u>Policy 4AB: Enabling farming activities managed in accordance with industry schemes. Enable existing farming activities that have a low risk of increased contaminant discharge for their farming type and/or a likelihood of diffuse discharge reductions over time because:</u> "	Support  Oppose	The Director-General is generally supportive of the intent of the submitter to clarify interpretation between Policy 1 and Policy 4.  The Director-General is generally not supportive of the use of certified industry schemes	I seek that this submission point be allowed.  I seek that this submission point be disallowed.

Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
			<p><u>a. They are part of an industry scheme designed to manage diffuse discharge risk; and</u></p> <p><u>b. In accordance with that industry scheme the diffuse nitrogen discharge by those properties whose Nitrogen Reference Point is above the 75th percentile nitrogen leaching value for the relevant freshwater management unit^."</u></p>			
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-10601 V1PC1-1376	Fonterra ID74057	<p>AND ADD a NEW Policy 11A to read: "<u>Policy 11A: Offsetting the effects of Point Source Discharge</u></p> <p><u>Where it is not practicable to avoid or mitigate all any adverse effects, an offset measure may be proposed in an alternative location or locations to the point source discharge, for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that will or may result from allowing the activity provided that the:</u></p> <p>a. The primary discharge does not result in any significant toxic adverse effect at the point source discharge location; and</p> <p>b. The offset measure is for the same contaminant; and</p> <p>c. The offset measure occurs preferably within the same sub-catchment in which the primary discharge occurs and if this is not practicable, then within the same Freshwater Management Unit^ or a Freshwater Management Unit^ located upstream; and</p>	Oppose	The Director-General is not supportive of offsetting for use with point source effects.	I seek that this submission point be disallowed.



Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
			<u>definition excludes any wetland constructed for the purpose of mitigating the effects of agricultural discharges on water quality."</u>			
Schedule B - Nitrogen Reference Point	PC1-10517 V1PC1-1369	Fonterra ID74057	AND ADD a NEW Part eA of Schedule B to read: <u>"...eA: Once a year, following the release of a new version of Overseer (or any other model approved by the Chief Executive of the Waikato Regional Council), the Nitrogen Reference Point will be recalculated by the Waikato Regional Council (or for those registered to a Certified Industry Scheme, by the Certified Industry Scheme provider) using the latest version of that model and same data input file as was used to calculate the Nitrogen Reference Point submitted to Council in accordance with part e of this Schedule. When such a recalculation occurs, the resulting leaching rate becomes the Nitrogen Reference Point for the purposes of Rules 3.11.5.2 to 3.11.5.7..."</u>	Support	The Director-General supports the certainty for plan users and decision makers regarding the accuracy of information relied on from the appropriate version of OVERSEER.	I seek that the submission point be allowed.
Schedule 1 - Requirements for Farm Environment Plans	PC1-10559 V1PC1-1370	Fonterra ID74057	AND ADD a NEW item 'g' to Section 2 (Immediately above Section 3): <u>"g. A description of any other wastewater irrigation or fertiliser management activities on the site including the use of fertilised replacements."</u>	Support	This additional information suggested by the submitter is useful as part of a Farm Environment Plan	I seek that this part of the submission be allowed.
Additions to Glossary of Terms	PC1-10616 V1PC1-839	Fonterra ID74057	ADD to the Glossary of terms a definition of regionally significant infrastructure to read: <u>"Regionally Significant Infrastructure – means an economic activity based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale."</u>	Oppose	The definition for Regionally Significant Infrastructure in the Plan should be the same as that in the Waikato Regional Policy Statement.	I seek that this part of the submission be disallowed.

Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
			<p><u>These may include social, economic or cultural benefits. Regionally significant industry includes:</u>  <u>a. Dairy manufacturing sites;</u>  <u>b. Meat processing plants;</u>  <u>c. Pulp and paper processing plants; and</u>  <u>d. Mineral extraction activities."</u></p> <p>AND ADD a NEW definition of 'effective hectares' to read:  <u>"Effective hectares: means the area of a property or enterprise as measured in hectares which is used for the regular grazing of animals or growing of crops or activities ancillary to those uses and which specifically excludes Indigenous forest, plantation forest, closed canopy scrubland and protected wetlands."</u></p> <p>AND ADD a NEW definition of 'protected wetland' to read:  <u>"Protected wetland: for the purpose of the definition of 'effective hectares' means a wetland that is fenced to exclude stock or which is legally protected by a rule in a district or regional plan, condition of resource consent or other legally binding instrument such that it cannot be lawfully grazed, drained, cleared or otherwise modified without the consent of a local authority or third party and for which no such consent has been issued. This definition excludes any wetland constructed</u></p>	<p>Oppose</p> <p>Oppose</p>	<p>The Director-General supports a natural capital based approach to allocation whereby all land is treated as equal regardless of the overlying land use. While the Director-General agrees with the submitter that bad practice must not be rewarded, there are other, more appropriate, mechanisms to manage this</p> <p>The Director-General considers that all wetlands should be protected particularly given the reduction in their extent and quality regionally and nationally. The approach suggested by the submitter will see the protection of wetland areas as a disincentive and is therefore not supported.</p>	<p>I seek that this part of the submission be disallowed.</p> <p>I seek that this part of the submission be disallowed.</p>

Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
			<u>for the purpose of mitigating the effects of agricultural discharges on water quality."</u>			
General	V1PC1-801	Fonterra ID74057	ADD a NEW schedule to PPC1 to be named 'Schedule BA' relating to the use of a Nitrogen Risk Scorecard Reference Grade and assessment.	Oppose	The Director-General does not support the Nitrogen Risk Scorecard approach proposed by the submitter.	I seek that the submission point is disallowed.
General	V1PC1-901	Fonterra ID74057	ADD to PPC1, the requirement that farms over 20 hectares need to provide an FEP.	Oppose	The Director-General supports the requirement for Farm Plans for farms with an area greater than 4.1ha as proposed.	I seek that the submission point be disallowed.
3.11.5 Rules	V1PC1-757	Fonterra ID74057	ADD a revised land use rule framework (and supporting Schedules) that simplifies the rule structure.	Oppose	It is not clear from the submission what changes the submitter is seeking to "simplify" the rule structure.	I seek that the submission point be disallowed.
Schedule A - Registration with Waikato Regional Council	V1PC1-796	Fonterra ID74057	ADD Schedule A item 6 as follows: <u>6. i.v For any property or enterprise intending to use the Nitrogen Reference Scorecard assessment for compliance purposes, the peak stocking rate as at in the reference period 2014/15 and 2015/16</u>	Oppose	The Director-General does not support the Nitrogen Risk Scorecard concept proposed by the submitter.	I seek that this submission point be disallowed.
Additions to Glossary of Terms	V1PC1-812	Fonterra ID74057	ADD a NEW definition to the Glossary of Terms to PPC1 called 50th percentile nitrogen leaching value which shall read: <u>50th percentile nitrogen leaching value The 50th percentile value (units of kg N/ha/year) of all the Nitrogen Reference Point values for dairy farming properties and enterprises within each Freshwater Management Unit and which are received by the Waikato Regional Council by 1 November 2020, as determined by the Chief Executive of the Waikato Regional Council and published on the Waikato Regional</u>	Support	The Director-General is supportive of definitions that aid the interpretation of the Plan for plan users and decision makers.	I seek that the submission point be allowed.

Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
			<u>Council website on or before 28 February 2021.</u>			
Additions to Glossary of Terms	V1PC1-814	Fonterra ID74057	ADD a NEW definition to the Glossary of Terms to PPC1 called Nitrogen Risk Scorecard Reference Grade which reads: <u>Nitrogen Risk Scorecard Reference Grade</u> <u>The nitrogen leaching grade determined in accordance with the assessment tool described in Schedule BA 1.</u>	Oppose	The Director-General does not support the Nitrogen Risk Scorecard concept proposed by the submitter.	I seek that this submission point be disallowed.
Additions to Glossary of Terms	V1PC1-815	Fonterra ID74057	ADD a NEW definition to the Glossary of Terms to PPC1 called Nitrogen Risk Scorecard Assessment Grade which reads: <u>Nitrogen Risk Scorecard Assessment Grade</u> <u>The nitrogen leaching grade determined in accordance with the assessment tool described in Schedule BA 5.</u>	Oppose	The Director-General does not support the Nitrogen Risk Scorecard proposed by the submitter.	I seek that this submission point be disallowed.
Additions to Glossary of Terms	V1PC1-816	Fonterra ID74057	ADD a NEW definition to the Glossary of Terms to PPC1 called Peak stocking rate, which reads: <u>Peak stocking rate</u> <u>The maximum number of stock units per effective hectare on a property or enterprise at any time over the period 1 June to 30 May.</u>	Oppose	The Director-General does not support the concept of peak stocking rate being used to assist in the management of contaminant loss.	I seek that this submission point be disallowed.
3.11.5 Rules	PC1-10162 V1PC1-1614	Horticulture NZ ID 73801	ADD the following rule: <u>"Rule 3.11.5.X - Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective</u> <u>The management of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens onto or into land by a catchment collective in circumstances which may result in those contaminants entering</u>	Support	The Director-General is generally supportive of sub-catchment scale management plans.	I seek that the submission point be allowed.

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
			<p><u>water is a restricted discretionary activity (requiring resource consent).</u>  <u>Waikato Regional Council restricts its discretion over the following matters:</u>  <u>i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</u>  <u>ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</u>  <u>iii. Achieving the contaminant load reduction targets specified for each for sub-catchment in Schedule 1C Table XX</u>  <u>iv. The matter set out in Schedule 1C Catchment Collectives.</u>  <u>v. The term of the resource consent. Minimum 15 years.</u>  <u>vi. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</u>  <u>vii. The timeframe and circumstances under which the consent conditions may be reviewed.</u>  <u>viii. The matters addressed by Schedules A and C and the Nitrogen Reference Point being:</u>  <u>1. In conformance with Schedule B; or</u>  <u>2. Determined through use of proxy farm systems to approximate the nitrogen reference for the catchment collective; or</u>  <u>3. Through modelling a series of collective mitigations that are estimated sufficient to meet the load limit targets, in accordance with the criteria in schedule 1C.</u></p>			

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			<p><u>Notification:</u>  <u>Consent applications will be considered without notification, and without the need to obtain written approval of affected persons"</u></p>			
Schedule 1 - Requirements for Farm Environment Plans	PC1-12435 V1PC1-1646	Horticulture NZ ID 73801	<p>AND ADD a NEW Schedule 1B to read as follows:  <u>"Schedule 1B - Requirements for Farm Environment Plans for commercial vegetable production enterprises</u>  <u>1. A Farm Environment Plan shall be prepared in accordance with the requirements of A below. The Farm Environment Plan shall be certified as meeting the requirements of A by a Certified Farm Environment Planner (commercial vegetable production).</u>  <u>2. The construction of a farm plan does not require duplication of material within existing farm environment plans that are considered sufficient for purpose by a Certified Farm Environment Planner (commercial vegetable production).</u>  <u>3. Farm plans are not required to duplicate material provided to Waikato Regional Council for the purpose of complying with other rules in the plan.</u>  <u>4. Farm Plans will not be incorporated into consent conditions as a whole; but matters of control or discretion will include relevant actions committed to by the consent holder.</u>  <u>5. The Farm Environment Plan shall identify key risk areas for the discharge of sediment, nitrogen, phosphorus and microbial</u></p>	Support	The Director-General supports the use of Farm Environment Plans in achieving reductions in the leaching of contaminants whilst maintaining on farm productivity.	I seek that the submission point be allowed.

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			<p><u>pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants where practicable.</u></p> <p><u>The Farm Environment Plan must clearly identify how any specified consent condition will be complied with.</u></p> <p><u>A Farm Environment Plans shall contain as a minimum:</u></p> <ol style="list-style-type: none"> <li><u>1. The name of the legal entity registered with the Waikato Regional Council.</u></li> <li><u>2. Information provided by the Council from registration between 1 Sep 2018 and 31 March 2019.</u></li> <li><u>3. A description of the enterprise, detailing the general rotational cropping system, properties owned, leased and otherwise farmed on over time. This will include the legal description for each parcel of land.</u></li> <li><u>4. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the farming activities on the property, and the priority of those identified risks, having regard to sub-catchment targets in Table 3.11-1 and the priority of lakes within the sub-catchment. As a minimum, the risk assessment shall include:</u> <ol style="list-style-type: none"> <li><u>a. A risk assessment for nutrient discharges that is approved by a Certified Farm Environment Planner (commercial vegetable crops). The risk assessment should be equivalent to the process outlined in Section</u></li> </ol> </li> </ol>			

Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
			<p><u>4 of the Horticulture New Zealand Code of Practice for Nutrient Management Version 1.0 August 2014.</u></p> <p><u>b. A risk assessment for soil conservation purposes, that is approved by a Certified Farm Environment Planner (commercial vegetable crops). The risk assessment should be equivalent to the process outlined in Section 1 of the Horticulture New Zealand Erosion &amp; Sediment Control Guidelines for Vegetable Production Version 1.1 June 2014.</u></p> <p><u>c. If manures are used, undertake a microbiological discharge risk assessment.</u></p> <p><u>5. If stock are present on land managed within the enterprise, provisions of Schedule 1 relating to the farming of animals apply. If stock are present a risk assessment for stock related discharges must be undertaken.</u></p> <p><u>6. A schedule of mitigation actions and target completion dates derived from the risk assessments undertaken in 4 and 5 above.</u></p> <p><u>7. Vegetable Growing Minimum Standards Farm environment plans required under Rule 3.11.5.5, 3.11.5.6b, or 3.11.5.X shall, in addition to the matters set out above, ensure the following matters are addressed."</u></p> <p>AND INCLUDE the table for Vegetable Growing Minimum Standards as laid out in the submission.</p>			

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Schedule 1 - Requirements for Farm Environment Plans	PC1-10215 V1PC1-1641	Horticulture NZ ID 73801	<p>ADD a NEW Schedule 1C to provide for sub-catchment scale solutions AND ADD a NEW Schedule 1C to read as follows:</p> <p><u>"Schedule 1C - Requirements for a sub-catchment scale management plan applying to Rule 3.11.5.X iv – Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective.</u></p> <p><u>A sub-catchment scale management plan (SSMP) shall be prepared in accordance with the requirements below.</u></p> <p><u>1) The (SSMP) must be approved by the Regional Council Chief Executive before an application under Rule 3.11.5.X can be granted by the Council.</u></p> <p><u>2) The SSMP must meet or exceed the expected reduction in discharges to freshwater that would be achieved through completing and implementing a farm or enterprise scale farm environment plan in accordance with Schedule 1 and Schedule 1b. The achievement in reduction of discharges must be comparable when considered over all of the properties and enterprises managed by the SSMP.</u></p> <p><u>3) The SSMP must be the responsibility of a legal entity that is accountable for achieving compliance with the conditions of a resource consent issued under Rule 3.11.5.X.</u></p> <p><u>4) The SSMP must be supported by a decision support tool that is able to be</u></p>	Support	The Director-General is generally supportive of sub-catchment scale management plans.	I seek that the submission point be allowed

Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
			<p><u>utilised as the accounting framework for the relevant sub-catchment. The decision support tool must:</u></p> <p><u>a) Calibrate discharges and hydrological flows to observed monitoring sites within the catchment. The calibration must achieve at least achieve a 'Satisfactory' criteria for a daily model with NSE - 0.6, % bias- +/- 25% and the decision support tool must be capable of continuous upgrade and improvement.</u></p> <p><u>b) Be capable of integrating with other sub-catchment, freshwater management unit and catchment scale accounting systems.</u></p> <p><u>c) Be able to measure mitigations for microbial, sediment, nitrogen and phosphorus discharges at all scales within the domain of the decision support tool to a standard approved by peer review agent approved by the Chief Executive of the Regional Council.</u></p> <p><u>d) Be made available to the Council for use in assessing compliance with the load limit targets for the relevant sub-catchment listed in Schedule 1C Table XX.</u></p> <p><u>5) The SSMP must clearly identify how any specified consent condition will be complied with.</u></p> <p><u>6) The SSMP shall contain as a minimum:</u></p> <p><u>a) The name of the legal entity registered with the Waikato Regional Council.</u></p> <p><u>Information provided by the Council from registration between 1 Sep 2018 and 31 March 2019.</u></p>			

Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
			<p>b) <u>A legal description of all properties and enterprises the legal entity described in Schedule 1C 3) above have legal authority to act on behalf of.</u></p> <p>c) <u>A description of the nature of enterprises, farms and properties and the domain of the SSMP.</u></p> <p>d) <u>An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the activities within the SSMP domain, and the priority of those identified risks, having regard to sub-catchment load targets in Schedule 1C Table XX below.</u></p> <p>e) <u>A schedule of approved mitigation actions and target completion dates.</u>"</p> <p>AND ADD Schedule 1C Table XX referred to in the submission.</p>			
Additions to Glossary of Terms	PC1-10227 V1PC1-1642	Horticulture NZ ID 73801	<p>ADD a NEW definition for Catchment Collective to read:  <u>"Definition - Catchment collective  Catchment collective: means a group of enterprises or properties in multiple ownership, where the owners of those enterprises or properties undertake farming activities and operate as a collective for the purposes of contaminant management."</u></p> <p>AND ADD a NEW definition for Certified Farm Environment Planner (Commercial Vegetable Production) to read:  <u>"Certified Farm Environment Planner (Commercial Vegetable Production)</u></p>	Support	The Director-General supports the concept of defining a collective catchment but considers a critical factor missing from the proposed definition is that the enterprises or properties are within the same catchment.	I seek that this submission point be allowed in part.

Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
			<p><u>Certified Farm Environment Planner (Commercial Vegetable Production): is a person or entity certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a Certified Farm Environment Planner (Commercial Vegetable Production) and has as a minimum the following qualifications and experience:</u></p> <p><u>a. Tertiary qualifications in agronomy or agricultural engineering</u></p> <p><u>b. More than 15 years' experience working with commercial vegetable cropping systems</u></p> <p><u>c. A certificate of competence approved by the Waikato Regional Council relating to the relevant aspects of environmental farm plan assessment"</u></p> <p>AND ADD new definition for Sub-catchment Scale Management Plans to read:  <u>"Sub-catchment Scale Management Plan (SSMP)</u>  <u>Sub-catchment Scale Management Plan (SSMP); means a sub-catchment scale plan for that sets out actions and responsibilities for a Catchment Collective (representing all or part of a sub-catchment) for the purposes of contaminant management that meets or exceeds the expected reduction in discharge to freshwater that would otherwise be achieved through a Farm Environment Plan."</u></p>			



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activities			fruit production (considered a low intensity farming activity).  ADD a NEW Rule 3.11.5.1 to read: 7x The farming activities do not form part of an enterprise being undertaken on more than one property.; where the primary activity is fruit production (considered a low Intensity farming activity). AND ADD any consequential amendments.			
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	V1PC1-902	Horticulture NZ ID 73801	AND ADD under the following paragraph: The use of the land for farming activities that does not comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a restricted discretionary activity (requiring resource consent). Discharges related to the use of land for farming activities that either: a) cannot comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water; or b) is for new commercial vegetable cropping that can demonstrate a lesser effect from the contaminant discharge compared with the existing activity (when the diffuse	Support	The Director-General is supportive of the restricted discretionary activity for farming activities that do not comply with the permitted and controlled activity rules. The Director-General is particularly supportive of the consideration of cumulative effects on water quality of the catchment.	I seek that the submission points be allowed.

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			<p>discharges of nitrogen, phosphorus, sediment and microbial pathogens are considered together).</p> <p>AND ADD an additional sub-clause to read: viii. With respect to applications made under 3.11.5.6 b) the relevant clauses of Policy 3.</p> <p>Footnote: 7 All except clause b of Policy 3.</p> <p>AND ADD a NEW Rule: Rule 3.11.5.X - Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective. The management of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens onto or into land by a catchment collective in circumstances which may result in those contaminants entering water is a restricted discretionary activity (requiring resource consent). Waikato Regional Council restricts its discretion over the following matters:</p> <ul style="list-style-type: none"> <li>i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</li> <li>ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</li> <li>iii. Achieving the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX.</li> <li>iv. The matter set out in Schedule 1C Catchment Collectives.</li> </ul>			

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
			<p>v. The term of the resource consent. Minimum 15 years.</p> <p>vi. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</p> <p>vii. The time frame and circumstances under which the consent conditions may be reviewed.</p> <p>viii. The matters addressed by Schedules A and C and the Nitrogen Reference Point being:</p> <ol style="list-style-type: none"> <li>1. In conformance with Schedule B; or</li> <li>2. Determined through use of proxy farm systems to approximate the nitrogen reference for the catchment collective; or</li> <li>3. Through modelling a series of collective mitigations that are estimated sufficient to meet the load limit targets, in accordance with the criteria in schedule 1C.</li> </ol> <p>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons.</p> <p>OR if Restricted Discretionary status is not deemed appropriate, AMEND to provide for these activities as full Discretionary rules.</p>			
Schedule 2 - Certification of Industry Schemes	V1PC1-893	Horticulture NZ ID 73801	<p>ADD a new sub-clause under 3 a.) as follows:</p> <ol style="list-style-type: none"> <li>3. Has documented systems, processes and procedures to ensure:</li> </ol>	Oppose	The Director-General generally opposes the use of certified industry schemes.	I seek that this submission point be disallowed.

Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
			<u>a.) Competency assessment and checks for people who generate and subsequently monitor Farm Environment Plans in line with the relevant industry qualifications as agreed with Waikato Regional Council.</u>			
Map 3.11-1: Map of the Waikato and Waipa River catchments, showing Freshwater Management Units	PC1-3649 V1PC1-1524	Waikato Regional Council ID72890	ADD an additional map at a scale sufficient to accurately map and name all Lake Freshwater Management Unit*.	Support	The accurate mapping of freshwater management units at a scale that ensures the boundary of each FMU is clearly identifiable is necessary to the accurate interpretation of the Plan.	I seek that this submission point be allowed.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-3420 V1PC1-1516	Waikato Regional Council ID72890	AMEND Rule 3.11.5.4(4) to add a new item to read: "The use of land for farming activities complies with Schedule C."	Support	The additional clarification of compliance with Schedule C relating to Stock exclusion is supported by the Director-General.	I seek that this submission point be allowed.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-3477 V1PC1-1518	Waikato Regional Council ID72890	AMEND Rule 3.11.5.6 by adding a new matter over which Council reserves its discretion to read: "viii. Consistency with the Objectives and Policies of the Waikato Regional Plan or proposed regional plan."	Support	The additional matter of control specifying the requirement to be consistent with the objectives and policies is supported by the Director-General.	I seek that this submission point be allowed.
Schedule C - Stock exclusion	PC1-3571 V1PC1-1521	Waikato Regional Council ID72890	AND ADD at the end of Schedule C an advisory note to read: " <u>A reference to a river includes a reference to a stream.</u> "	Support	The consideration of both rivers and streams for stock exclusion is appropriate.	I seek that this submission point be allowed.
Table 3.11-1: Short term and long term numerical water quality targets	PC1-3635 V1PC1-1523	Waikato Regional Council ID72890	AMEND Table 3.11-1: Dune, Riverine, Volcanic and Peat Lakes freshwater Management Units on page 67, by adding two new columns to provide targets for Annual Median and Annual Maximum	Support	The Director-General supports the inclusion of targets for ammonia however the targets need to be set to ensure ecosystem health is achieved as	I seek that this submission point be allowed to the extent that it includes

Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
for the Waikato and Waipa River catchments			Ammonia as per NPSFM - Band C for 80 year target  AND AMEND Table 3.11-1 by adding a footnote to read: "that the annual median and annual maximum ammonia have been adjusted for pH."		outlined in the Director-General's original submission.	Ammonia targets for lakes.
Table 3.11-2: List of sub-catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments	PC1-3646 V1PC1-1495	Waikato Regional Council ID72890	AND AMEND add to the list in Table 3.11-2 the combined area as: 'Waitomo catchment', 'Priority 1'.	Support	The combined Waitomo catchment is supported by the Director-General as having a Priority 1 status.	I seek that this submission point be allowed.
Map 3.11-2: Map of the Waikato and Waipa River catchments, showing subcatchments	PC1-3651 V1PC1-1525	Waikato Regional Council ID72890	AMEND Map 3.11-2 by adding a comment to state that sub-catchment plans can include a multiple sub-catchment approach.  AND AMEND add to the list in Table 3.11-2 the combined area as: "Waitomo catchment, Priority 1".	Support	Enabling sub-catchment plans to include a multiple sub-catchment approach is supported by the Director-General.	I seek that this submission point be allowed.
Additions to Glossary of Terms	PC1-3666 V1PC1-1528	Waikato Regional Council ID72890	ADD a NEW definition to the Glossary of Terms to read "Current version of OVERSEER® is the version of the Overseer® Model with the most recent release date."  AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Period to read: "...is a property's or enterprise's 2014/15 and 2015/16 financial years, except for properties or enterprises where the principle land use is commercial vegetable production, in which case the	Support	A definition for the "current" version of OVERSEER is supported to provide clarity to plan users and decision makers.  Definitions for Nitrogen reference period, nitrogen reference period data and nitrogen reference point data are supported to provide clarity to plan users and decision makers.	I seek that the submission points be allowed to extent that they provide further clarity to plan users and decision makers.

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
			<p>nitrogen reference period is the period commencing with the property's or enterprise's 2006/7 financial year and ending with its 2015/16 financial year."</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Period Data to read: "is the set of verified OVERSEER input parameters for each of the financial years of the nitrogen reference period."</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Point Data to read: "is the verified Overseer input parameters for the single financial year of the nitrogen reference period that when modelled in the version of Overseer current at 1 April 2019 results in the highest nitrogen leaching rate."</p> <p>AND ADD to the Glossary of Terms in Chapter 3.11 a specific definition for urban properties.</p> <p>AND ADD a NEW definition to the Glossary of Terms for Wetland to read: "For the purposes of Chapter 3.11 Includes permanently or intermittently wet areas, shallow water, and land water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions."</p>		<p>A definition of urban properties is supported to provide clarity to plan users and decision makers.</p> <p>A definition for wetland is supported to provide clarity to plan users and decision makers however the Director-General considers that the definition used should be the same as that in the Waikato Regional Policy Statement.</p>	

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
General	V1PC1-778	Federated Farmers	The submitter seeks to include a new schedule to provide for a simplified FEP.	Oppose	The Director-General considers that the level of detail/ information contained in a Farm Environment Plan needs to be more detailed rather than less.	I seek that the submission point be disallowed.
Objective 4: People and community resilience	V1PC1-143	Federated farmers	The submitter seeks to add two new paragraphs to Objective 4 to read "(b) addressing information gaps and gaining an understanding of the current water state, water quality issues and the causes for each sub-catchment and the relationship with other sub-catchments"; and "(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."	Oppose	The Director-General does not support the amendments to the objective proposed by the submitter.	I seek that the submission point be disallowed.
3.11.3 Policies	V1PC1-175	Federated Farmers	The submitter seeks to add a new Policy 2B: Review and amendment of Certified Farm Environment Plans.	Support	The Director-General is generally supportive of enabling flexibility within a Farm Environment Plan.	I seek that the submission point be allowed.
3.11.3 Policies	V1PC1-240	Federated Farmers	The submitter seeks to add a new Policy 12A Additional considerations for diffuse discharges in relation to water quality targets.	Oppose	The Director-General does not support the additional policy as proposed by the submitter	I seek that the submission point be disallowed.
Policy 7: Preparation for allocation in the future.	V1PC1-224	Federated Farmers	The submitter seeks to add a new paragraph (b) to Policy 7 to read: "collating information obtained from the Catchment Profiles and sub-catchment plans, models or data obtained through Implementation of this Plan change."	Support	The Director-General is generally supportive of the consideration of sub-catchment information and plans when outlining how allocation of diffuse discharges will be managed.	I seek that the submission point be allowed.

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
			The submitter also seeks to add the following sentence after proposed paragraph (c): "In preparing for the future, the Nitrogen Reference Point established under Policy 2(c) is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future."	Oppose	The Director-General considers it is appropriate to utilise Nitrogen Reference Points to when establishing future allocation regimes.	I seek that the submission point be disallowed.
3.11.4 Implementation methods	V1PC1-290	Federated Farmers	The submitter seeks to add a new method 3.11.4.5A Catchment Profiles.	Support	The Director-General is generally supportive of provision of information on sub-catchments for use by plan users and decision makers.	I seek that the submission point be allowed.
3.11.4 Implementation methods	V1PC1-314	Federated Farmers	The submitter seeks to add a new method 3.11.4.13 Calculation of 75 <sup>th</sup> percentile in consultation and collaboration with industry and stakeholders.	Support	The Director-General is generally supportive of the certainty for plan users and decision makers on the calculation of the 75 <sup>th</sup> percentile.	I seek that the submission point be allowed.
3.11.5 Rules	PC1-10844	Federated Farmers	The submitter seeks to add a new permitted activity rule that the use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1ha is a Permitted Activity provided that: <ul style="list-style-type: none"> <li>1) The change in use of the land is not from non-milking dairy to milking dairy; or</li> <li>2) The change in the numbers of breeding cattle, deer, pigs or horses does not exceed 15% of the numbers used to establish a Nitrogen Reference Point; or</li> </ul>	Oppose	The permitted activity proposed by the submitter is not supported by the Director-General.	I seek that the submission point be disallowed.

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
			The change in the numbers of trading cattle, deed, pigs or horses does not exceed 15% of the numbers used to establish the Nitrogen Reference Point.			
3.11.5 Rules	V1PC1-499	Federated Farmers	The submitter seeks a new rule 3.11.5.4A Controlled Activity Rule – the use of land for farming activities exceeding the Nitrogen Reference Point and diffuse discharges in circumstances which may result in those contaminants entering water.	Oppose	The Director-General does not support the new controlled activity proposed by the submitter.	I seek that the submission point be disallowed.
3.11.5 Rules	V1PC1-570	Federated Farmers	The submitter seeks to include a new rule 3.11.5.5A Controlled Activity Rule – Transfer of Commercial Vegetable Production Activity subject to a number of standards.	Oppose	The Director-General does not support the transfer of activities between sites as a controlled activity as proposed by the submitter.	I seek that the submission point be disallowed.
3.11.5 Rules	V1PC1-571	Federated Farmers	The submitter seeks to add a new section before Rule 3.11.5.6.to read: Information Requirements – Controlled Activities.	Oppose	The Director-General is generally not supportive of including text as proposed by the submitter as the provisions of Schedule 4 of the RMA outline the information required to ensure an application for resource consent is complete.	I seek that the submission point be disallowed.
3.11.5 Rules	V1PC1-708	Federated Farmers	The submitter seeks to add a new section Information Requirements – Restricted Discretionary and Discretionary Activities.	Oppose	The Director-General is generally not supportive of including text as proposed by the submitter as the provisions of Schedule 4 of the RMA outline the information required to ensure an application for resource consent is complete.	I seek that the submission point be disallowed.

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
3.11.5.2 Permitted Activity Rule – Other farming activities	V1PC1-338	Federated Farmers	The submitter seeks to add further paragraphs to Rule 3.11.5.3(4) that address the Simplified Farm Environment Plan.	Oppose	The Director-General does not support a simplified farm environment plan.	I seek that the submission point be disallowed.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	V1PC1-357	Federated Farmers	The submitter seeks to add new paragraphs (6), (7) and (8) to Rule 3.11.5.3 to address the Nitrogen Reference Point.	Support	The Director-General is generally supportive of additional requirements for a permitted activity.	I seek that the submission point be allowed.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	V1PC1-468	Federated Farmers	The submitter seeks to add a new paragraph to Rule 3.11.5.4(5) to address the diffuse discharge of nitrogen, the Nitrogen Reference Point and the 75 <sup>th</sup> percentile.	Support	The Director-General is generally supportive of additional requirements for a controlled activity.	I seek that the submission point be allowed.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	V1PC1-498	Federated Farmers	<p>The submitter seeks to add a new paragraph to Rule 3.11.5.5 to read “c. The diffuse discharge of nitrogen from the property or enterprise, as measured by the five-year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprises Nitrogen Reference Point, unless other suitable mitigations are specified.”</p> <p>The submitter seeks to add 3 new paragraphs (j), (k) and (l) addressing the Farm Environment Plan and the process for amending it.</p>	Oppose	The Director-General does not support the change made by the submitter.	I seek that the submission point be disallowed.

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
			The submitter seeks to add a new permitted activity rule for commercial vegetable growing that is registered to a certified industry scheme.			
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	V1PC1-572	Federated Farmers	The submitter seeks to add a new paragraph (vii) to read “if the property is subdivided, the Nitrogen Reference Point for all of the lots created by the subdivision by reference to the significance of any failure to comply with Schedule B for each individual lot in the context of the matters referred to in paragraph ii above.”	Support	The Director-General supports a clear process for determining a Nitrogen Reference Point for properties when subdivision occurs.	I seek that the submission point be allowed.
Schedule B – Nitrogen Reference Point	V1PC1-717	Federated Farmers	The submitter seeks to add a new paragraph (h) to Schedule B that calculates the Nitrogen Reference Point.	Oppose	The Director-General does not support the addition suggested by the submitter	I seek that the submission point be disallowed.
Schedule 1 – Requirements for Farm Environment Plans	V1PC1-766	Federated Farmers	The submitter seeks significant amendments to Schedule 1 including defining the purpose of a FEP and the process for amending and/or reviewing the FEP.	Support	The Director-General is generally supportive of a defined purpose for FEPs and that a processing for amending and reviewing these plans be formalised.	I seek that the submission point be allowed.
Additions to Glossary of Terms	V1PC1-792	Federated Farmers	The submitter seeks to add a new definition of Catchment Profile.	Support	The Director-General is supportive of definitions that aid the interpretation of the Plan for plan users and decision makers.	I seek that the submission point be allowed.
Additions to Glossary of Terms	V1PC1-798	Federated Farmers	The submitter seeks to add a new definition of “farm enterprise.”	Support	The Director-General is supportive of definitions that aid the interpretation of the Plan for plan users and decision makers.	I seek that the submission point be allowed.
Additions to Glossary of Terms	V1PC1-802	Federated Farmers	The submitter seeks to add a new definition of Most Practicable Action.	Support	The Director-General is supportive of definitions that aid the interpretation of the	I seek that the submission point be allowed.

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
					Plan for plan users and decision makers.	
Additions to Glossary of Terms	V1PC1-811	Federated Farmers	The submitter seeks to add a new definition of 'urban properties.'	Support	The Director-General is supportive of definitions that aid the interpretation of the Plan for plan users and decision makers.	I seek that the submission point be allowed.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-10860	Federated Farmers	ADD a column containing the current attribute levels for each site to Table 3.11-1.	Support	The Director-General is supportive of including current attribute state information for each site however it is acknowledged that current state information can rapidly become out of date and perhaps it would be better to record this information in background technical documents that sit alongside the Plan..	I seek that the submission point be allowed.
Intrinsic values – Ecosystem health	V1PC1-204 PC1-10768	Auckland/Waikato Fish and Game and Eastern Region Fish and Game (Fish and Game) ID 74085	AND ADD a 5th bullet point to characterise and take into account relevant matters for the health of wetland ecosystems to read: 'Wetland ecosystem health is represented by extent, ecological integrity, hydrological integrity and water quality.' AND ADD the following bullet points: <ul style="list-style-type: none"> <li>• 'Healthy wetlands support abundant and diverse bird populations.</li> <li>• Healthy rivers and adjacent riparian margins have values as spawning habitat for inanga and trout.</li> </ul>	Support	The Director-General is supportive to the additions by the submission which prioritise wetland ecosystem health including all riparian spawning species together with inanga.	I seek that this submission point be allowed.

Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
			<ul style="list-style-type: none"> <li>Healthy rivers enable migration for spawning and to access food sources.'</li> </ul>			
3.11.2 Objectives	V1PC1 - 221	Fish and Game ID 74085	<p>The submitter seeks the addition of a new objective addressing an integrated approach.</p> <p><u>'An integrated approach is taken and the hydrological regime of the Whangamarino Wetland is actively managed to ensure the short, medium and long term targets can be achieved.'</u></p>	Support	The Director-General is supportive of additional provisions in the Plan which seek to restore and protect the Whangamarino Wetland.	I seek that this submission point be allowed.
3.11.2 Objectives	V1PC1-1558 PC1-10790	Fish and Game ID 74085	<p>The submitter seeks the addition of a new objective for restoring ecosystem health and the classification of significant wetlands.</p> <p>ADD a NEW Objective to read:  <u>"New Objective: Restoration and protection of ecosystem health  Ecosystem health is achieved in Waikato rivers, lakes and wetlands within 80 years as a result of staged reductions in point and non-point source discharges."</u>  AND ADD a NEW Objective to read:  <u>"New Objective: Classification, Maintenance and Enhancement of Significant Wetlands  a) All wetlands within the Waikato and Waipā catchments are assessed and added to Table 3.7.7 of the parent plan.  b) Wetlands within the Waikato and Waipā catch</u></p>	Support	The Director-General is supportive of new objectives which focus on the importance of restoration and protection of ecosystem health and the significant values of wetlands.	I seek that this submission point be allowed.
3.11.3 Policies	V1PC1-1547 PC1-10833	Fish and Game ID 74085	The submitter seeks to add a new policy to ensure individual and collective capability for achieving the plans objectives.	Support	The Director-General supports the direction sought by the submitter to ensure the	I seek that this submission point be allowed.

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
					objectives of the plan change area achieved.	
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-1592 PC1-12693	Fish and Game ID 74085	The submitter seeks to add a new clause to Policy 2 to read "f. promoting the use of riparian buffers to avoid sediment discharge."	Support	The Director-General is supportive of ensuring that discharge from land is appropriately managed.	I seek that this submission point be allowed.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems.	V1PC1-1563 PC1-10877	Fish and Game ID 74085	The submitter seeks to add a new clause (h) to Policy 3 promoting the use of riparian buffers to avoid sediment discharge.	Support	The Director-General is supportive of ensuring that discharge from land is appropriately managed.	I seek that this submission point be allowed.
3.11.4 Implementation methods.	V1PC1-632	Fish and Game ID 74085	The submitter seeks an amendment or additional method to address the Whangamarino Wetlands (to include targets and implementation methods).	Support	The Director-General is supportive of additional provisions in the Plan which seek to restore and protect the Whangamarino Wetland.	I seek that this submission point be allowed.
3.11.4 Implementation methods.	V1PC1-1544 PC1-10910	Fish and Game ID 74085	The submitter seeks to add new implementation methods including the allocation of diffuse discharges. <u>3.11.4.x Initiate allocation of diffuse discharges:</u> <u>The Waikato Regional Council will initiate a framework for the allocation of diffuse discharges including reductions in nitrogen load according to specified timeframes for reductions by sub-catchment. The Waikato Regional Council will:</u> <u>a. Use science-based limits for the total allowable load of a contaminant for sub-catchment which will meet the water quality objectives of the plan;</u>	Support	The Director-General is supportive of the greater certainty to plan users and decision makers provided by the proposed implementation methods.	I seek that this submission point be allowed.

Provision reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
			<p><u>b. Implement contaminant leaching rates for diffuse discharges from properties and enterprises by allocating to limits, targets and timeframes;</u></p> <p><u>c. Quantify nitrogen load reductions based on over-allocation of nitrogen beyond the science-based limit for subcatchments; and</u></p> <p><u>d. Define timeframes for sub-catchment nitrogen load reductions to be made."</u></p>			
3.11.4.4 Lakes and Whangamarino Wetland	V1PC1-272	Fish and Game ID 74085	The submitter seeks to include a new method addressing the restoration and protection of Whangamarino Wetland.	Support	The Director-General is supportive of additional provisions in the Plan which seek to restore and protect the Whangamarino Wetland.	I seek that this submission point be allowed.
3.11.5 Rules	V1PC1-1582 PC1-11003	Fish and Game ID 74085	The submitter seeks to include a new prohibited activity rule for the discharge of sediment from disturbed land to water without a buffer.	Support	The Director-General is supportive of ensuring that discharge from land is appropriately managed.	I seek that this submission point be allowed.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments.	V1PC1-299 PC1-11004	Fish and Game ID 74085	The submitter seeks to include new attributes with numeric limits and targets consistent with the swimmable, healthy and food gathering goals of the Vision and Strategy.	Support	The Director-General supports additional attributes, limits and targets consistent with the goals in the Vision and Strategy.	I seek that this submission point be allowed.
General	PC1-11007	Fish and Game ID 74085	AND ADD a NEW Schedule D for buffer requirements as provided in the table in Appendix 1 of the submission (page 64) AND ADD a NEW Schedule E that includes a 30% short term change as per the table in Appendix 1 of the submission (page 65)	Support	The Director-General supports the additional Schedules suggested by the submitter as they provide greater certainty to plan users and decision makers.	I seek that the submission point be allowed.
Policy 3: Tailored approach to	PC1-8207	The Royal Forest and Bird Protection Society of New	ADD a permitted activity rule that gives effect to Policy 3, AND requires the creation of a Nitrogen	Support	The Director-General is supportive of the intent of the relief sought by the submitter	I seek that the submission point be allowed.

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
reducing diffuse discharges from commercial vegetable production systems		Zealand Incorporated (Forest and Bird) ID74122	Reference Point, AND requires that the information necessary to verify the conditions have been complied with on an ongoing basis.		to ensure the intent of Policy 3 is reflected in the rule framework.	
Definition - Best management practice	PC1-8192	Forest and Bird ID74122	ADD a NEW Schedule XX that sets out the expectations for best management practice, including standards and measures that Council can enforce	Support	The Director-General is supportive of the greater certainty the relief sought by the submitter will provide to plan users and decision makers.	I seek that the submission point be allowed.
Definition - Certified Farm Environment Planner	PC1-8478	Forest and Bird ID74122	ADD the following requirements: "a. five years' experience in the management of pastoral, horticultural or arable farm systems; and; <u>is a current member of a professional institute that requires members to subscribe to a Code of Ethics, and has a procedure in place for dealing with complaints made against members; and</u> b. completed advanced training or a tertiary qualification in sustainable nutrient management (nitrogen and phosphorus) <u>demonstrates to Waikato Regional Council proficiency in the auditing of Farm Environment Plans against the matters set out in Part X(c) of Schedule Y [7]."</u>	Support	The Director-General is supportive of the amendments sought by the submitter in relation to the requirements of a certified farm environment planner.	I seek that the submission point be allowed.
Additions to Glossary of Terms	V1PC1-1010 PC1-11565	Waikato River Authority ID 74033	ADD a definition of wetland to the additions to the glossary to read "permanently or intermittently wet areas, shallow water, and land/water margins that support plants that are adapted to wet conditions" and apply this definition to rules relating to the drainage of wetlands, as contained within the operative Regional Plan.	Support	The Director-General supports a definition of wetland but seeks that the definition replicate the definition from the Waikato Regional Policy Statement, which is different to the definition proposed by the submitter through submissions.	I seek that this submission point be allowed.

<i>Provision reference</i>	<i>Submission point ID</i>	<i>Submitter and Submitter ID</i>	<i>Relief sought</i>	<i>Support/ Opposition</i>	<i>Reason</i>	<i>Decision sought</i>
General	PC1-11566 V1PC1-1017	Waikato River Authority ID 74033	ADD a policy ensuring review of methods in FMU's where water quality limits are breached or where monitoring trends show that the 10% improvement target is unlikely to be met.	Support	The Director-General supports a policy to ensure that where water quality limits are not being achieved the methods to achieve the limits are reviewed.	I seek that this submission point be allowed.