



Further Submission by Genesis Energy Limited

Trading as Genesis

ON

Proposed Plan Change 1 to the Waikato Regional Plan

17 September 2018

Further Submission by Genesis Energy Limited

Trading as Genesis

ON

Proposed Plan Change 1 to the Waikato Regional Plan

To: Waikato Regional Council
401 Grey Street
Private Bag 3038
Waikato Mail Centre
Hamilton 3240
healthyrivers@waikatoregion.govt.nz

Date: 17 September 2018

Name: Genesis Energy Limited

Contact: Karen Sky
Environmental Manager
Genesis Energy Limited
660 Great South Road
Greenlane
Auckland

Phone: 021 630 567

E-mail: karen.sky@genesisenergy.co.nz

Address for Service: As above

1. Introduction

Genesis Energy Limited, trading as Genesis (“**Genesis**”) makes the specific further submissions on Proposed Plan Change 1 (“**PC1**”) to the Waikato Regional Plan, as set out in the table below.

Genesis made submissions on PC1, listed as submission number 74052.

Genesis wishes to be heard in support of this submission.

In accordance with Clause 8(1)(b) of the First Schedule of the Resource Management Act 1991, Genesis has an interest in PC1 greater than the interest of the general public.

Genesis does not gain an advantage in trade competition through this submission.

If other persons make a similar submission, then Genesis would consider presenting joint evidence at the time of the hearing.

Yours sincerely



Karen Sky
Environmental Manager

Plan Change 1– Further Submissions

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
General						
The Oil Companies	PC1-2586	3.11 Waikato and Waipa River Catchments	AMEND 3.11 to ensure that the policy framework (particularly policies 10-13) is targeted only to the rural environment/farming activities.	Oppose	The Oil Companies submission seeks that PC1 be amended so that it only applies to rural / farming activities. While the focus of PC1 is on diffuse discharges (which is supported by Genesis), Genesis does not support this submission as the PC1 policy framework appropriately recognises the need to enable activities, guide decision makers and give effect to the Vision and Strategy.	Disallow Submission
Hamilton City Council	PC1-10061	Background and Explanation	AMEND Background and explanation page 15 to read as follows "Municipal and industrial point source discharges will also be required to revise their discharges in light of the Vision and Strategy and the water quality objectives, and sub catchment limits and targets that have been set. This <u>new requirement will happen apply</u> as the current consent terms expire. <u>It may take further time, over the 80-year period, for the 80 year targets specified in Table 3.11-1 to be achieved.</u> "	Support	Genesis supports the intent of the amendments proposed, recognising that for industrial discharges consent renewal is the appropriate time for new provisions to apply, and that these changes will be incremental over the 80-year timeframe.	Allow Submission
Rotorua Lakes Council	PC1-2465	Background and Explanation	AMEND 3.11 Background and Explanation to read: "Municipal and industrial point source dischargers will also be required to revise their discharges in light of the vision and strategy and water quality objectives, and sub-catchment limits and targets that have been set. <u>These new requirements will apply</u> as the current consent terms expire. <u>It may take further time, over the 80-year period for the targets specified in Table 3.11-1 to be achieved. Setting new requirements will take into account Investment in infrastructure already made, the net benefit from additional investment, alternative methods for contaminant reduction.</u> "	Support	Genesis supports the amendments proposed, recognising that for industrial discharges consent renewal is the appropriate time for new provisions to apply, and that these changes will be incremental over the 80-year timeframe.	Allow Submission

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
Pamu Farms of New Zealand	PC1-5847	Full Achievement of the Vision and Strategy will be Intergenerational	AMEND 3.11 to provide a new policy for a systematic review of point source and their seasonal effects on water quality. Include ranked and prioritised sites, to offer alternative land and funding. All catchment community to fund, including Agri-community/processing industries. OR ADD a NEW Policy and Rules for systemic S.128 review of all existing discharge permits over the term PPC1.	Oppose	This submission seeks that PC1 includes a new policy requiring review of point source discharges. This is inappropriate given that such point source discharge activities are subject to defined consent durations, the significant investment in consenting these discharges and ongoing monitoring and mitigation required by consent conditions. It is also noted that the need to obtain consent typically results in significant contaminant reduction being required by WRC through each successive consent renewal. Consents for point source discharges also already have review clauses therefore WRC has the ability to review them at appropriate times (even without policy support in PC1).	Disallow Submission
Hathaway, Bruce	PC1-3721	Reviewing Progress Toward Achieving the Vision and Strategy	AMEND Paragraph 6 to read: "...municipal and industrial point discharges, will be required to review their discharges as the current consent terms expire alongside PPC1 with all current consents being up for review. " AND AMEND Paragraph 1 to read: "... with on farm actions land based and recreational activities carried out and point source discharges reviewed as existing resource consents come up for renewal with existing resource consents to be reviewed."	Oppose	This submission seeks that all current point source discharge consents are reviewed to implement PC1, rather than at the time of consent renewal. For the reasons outlined above and the significant investment made by consent holders to improve the quality of point source discharges, Genesis considers that this is inappropriate.	Disallow Submission
Russell, Jill Adrienne	PC1-7085	Reviewing Progress Toward Achieving the Vision and Strategy	AMEND Reviewing progress toward achieving the Vision and Strategy, Paragraph 1 to REPLACE "on farm actions" with "land-based and recreational actions" and "and point source discharges" with "existing resource consents to be reviewed".	Oppose	This submission seeks that all current point source discharge consents are reviewed to implement PC1, rather than at the time of consent renewal. For the reasons outlined above and the significant investment made by consent holders to improve the quality of point source discharges, Genesis considers that this is inappropriate.	Disallow Submission
New Objectives						
Oji Fibre Solutions	PC1-6364	3.11.2 Objectives	ADD a NEW Objective as follows: "The management of discharges onto or into land or directly into water and land use activities affecting groundwater and surface water quality in a manner that:	Support in Part	Genesis supports the intent of this submission in ensuring the use values of the Waikato River are reflected appropriately in the objectives framework of PC1. Genesis welcomes the opportunity to discuss the appropriate wording to reflect this intent.	Allow Submission in Part Subject to Further Refinements

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
			<p>a) Safeguards the life supporting capacity of water and recognises and provides for the restoration and protection of the 80 year water quality attribute goals- in Table 3-11.1, through the adoption of the best practicable option;</p> <p>b) For discharges onto or into land, avoids, remedies or mitigates adverse effects on surface water of groundwater.</p> <p>c) Recognises that discharges contribute to social and economic well-being and in some cases significant investment relies on those discharges, including rural-based activities such as agriculture, perishable food processing and industry;</p> <p>d) Recognises that new regionally significant industrial discharges contribute to social and economic well-being and may be appropriate where such activities increase the net efficiency of resource use."</p>			
Objective 2: Social, economic and cultural wellbeing is maintained in the long term/Te Whāinga 2: Ka whakaūngia te oranga ā-pāpori, ā-ōhanga, ā-ahurea hoki i ngā tauroa						
Mercury NZ Ltd	Objective 2		<p>AMEND Objective 2 to read: "Waikato and Waipā communities and their economy (<u>as well as the regional and national communities and economies</u>) benefit from the restoration and protection of water quality in the Waikato and Waipā River catchments, which enables the people and communities to continue to provide for their social, economic and cultural well-being."</p>	Support	For the reasons outlined in the submission by Mercury, Genesis considers that the importance of the rivers to the regional and national communities / economies are recognised in Objective 2.	Allow Submission
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens/Te Kaupapa Here 1: Te whakahaere i ngā rukenga roha o te hauota, o te pūtūtae-whetū, o te waiparapara me te tukumate ora poto						

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
DairyNZ	PC1-10196	Policy 1	AMEND Policy 1 to Manage diffuse and point source discharges of nitrogen, phosphorus, sediment and microbial pathogens	Oppose	Plan Change 1 was promulgated primarily to control the effects of diffuse discharges of key contaminants. In this regard, Policy 1 should be specific to diffuse discharges as point source discharges are appropriately managed through the existing provisions in the regional plan (including rules that require discharges to obtain resource consent). Policies 10 – 13 of PC1 ensure that point source discharges are addressed to the extent necessary under the PC1 framework.	Disallow Submission
Federated Farmers of New Zealand	PC1-10815	Policy 1	AMEND to read as follows: "Manage <u>and require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, where improvements in the levels of specific contaminants will contribute to the relevant ten-year target in Table 3.11-1, by:</u> a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase <u>when assessed on a sub-catchment basis;...</u> "	Oppose	Plan Change 1 was promulgated primarily to control the effects of diffuse discharges of key contaminants. In this regard, Policy 1 should be specific to diffuse discharges and Federated Farmers is seeking that "diffuse" be deleted. This is not appropriate as the existing provisions in the regional plan (including rules that require discharges to obtain resource consent). Policies 10 – 13 of PC1 ensure that point source discharges are appropriately considered under the PC1 framework.	Disallow Submission
Hathaway, Bruce Hathaway, John	PC1-3763 PC1-12607	Policy 1	AMEND Policy 1 to include diffuse and point of source discharges. AMEND Policy 1 b) to read: "... contaminant discharge to water bodies to reduce their discharges through <u>a managed approach; and</u> " AND AMEND Policy 1 by adding in a new point to read as: " <u>d) Requiring point source activities with moderate high levels of contaminant to reduce their discharges to water bodies through a managed approach</u> ".	Oppose	Plan Change 1 was promulgated primarily to control the effects of diffuse discharges of key contaminants. In this regard, Policy 1 should be specific to diffuse discharges, particularly given that existing provisions in the regional plan (including rules that require discharges to obtain resource consent). Policies 10 – 13 of PC1 ensure that point source discharges are appropriately considered under the PC1 framework.	Disallow Submission

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
Lichtwark, Quintin Owen	PC1-1860	Policy 1	AMEND Policy 1 to read: "Policy 1: Manage diffuse <u>and point source</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens	Oppose	Plan Change 1 was promulgated primarily to control the effects of diffuse discharges of key contaminants. In this regard, Policy 1 should be specific to diffuse discharges, particularly given that existing provisions in the regional plan (including rules that require discharges to obtain resource consent). Policies 10 – 13 of PC1 ensure that point source discharges are appropriately considered under the PC1 framework.	Disallow Submission
Russell, Jill Adrienne	PC1-7244 PC1-12649	Policy 1	AMEND Policy 1 to include diffuse and point source discharges ADD Policy 1(d) to read as follows: "requiring point [of] source activities with moderate high levels of contaminant to reduce [to] their discharges to water bodies through a managed approach".	Oppose	Plan Change 1 was promulgated primarily to control the effects of diffuse discharges of key contaminants. In this regard, Policy 1 should be specific to diffuse discharges, particularly given that existing provisions in the regional plan (including rules that require discharges to obtain resource consent). Policies 10 – 13 of PC1 ensure that point source discharges are appropriately considered under the PC1 framework.	Disallow Submission
Policy 10: Provide for point source discharges of regional significance/Te Kaupapa Here 10: Te whakatau i ngā rukenga i ngā pū tuwha e noho tāpua ana ki te rohe						
Charion Investment Trust	PC1-7759	Policy 10	ADD to Policy 10: "...c. Continued operation of associated farming operations and their economic benefit to the region/sub-catchment."	Oppose	The Regional Policy Statement recognises regionally significant infrastructure and regionally significant industry. Policy 10 gives effect to the direction of the Regional Policy Statement. In this regard, Genesis opposes Policy 10 extending to cover non-point source discharges associated with agricultural/ farming activities.	Disallow Submission
Fletcher Trust	PC1-5995	Policy 10	ADD to Policy 10: "...c. Continued operation of associated farming operations and their economic benefit to the region/sub-catchment."	Oppose	The Regional Policy Statement recognises regionally significant infrastructure and regionally significant industry. Policy 10 gives effect to the direction of the Regional Policy Statement. In this regard, Genesis opposes Policy 10 extending to cover non-point source discharges associated with agricultural/ farming activities.	Disallow Submission

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
Horticulture NZ	PC1-10087	Policy 10	AMEND Policy 10 to ensure that the recognition in the Regional Policy Statement for agriculture as a regionally significant industry is given equal weight when ensuring that point source discharges are to give effect to the targets of the Vision and Strategy as outlined in Table 3.11-1	Oppose in Part	Genesis considers that the RPS recognition for primary production is in the context of the support it provides for regionally significant industry. In this regard Policy 10 appropriately recognizes the RPS position.	Disallow in Part
Matamata-Piako District Council	PC1-3505	Policy 10	RETAIN Policy 10 and amend to provide the following definitions: "Regionally significant infrastructure means 'municipal wastewater treatment plants, water supply treatment plants and bulk water supply, wastewater conveyance and storage systems, municipal supply dams and ancillary infrastructure."	Oppose in Part	While Genesis supports the intent of this submission point, the definition promoted by Matamata Piako District Council is not sufficiently broad to give effect to the Regional Policy Statement definition of "Regionally Significant Infrastructure", which includes electricity generation infrastructure.	Disallow in Part
McKie, Craig John	PC1-2050					
McKie, David Robert and Carmel Ann	PC1-2064	Policy 10	AMEND Policy 10 by including non-point discharges.	Oppose in Part	The Regional Policy Statement recognises regionally significant infrastructure and regionally significant industry. Policy 10 gives effect to the direction of the Regional Policy Statement. In this regard, Genesis opposes Policy 10 extending to cover non-point source discharges associated with agricultural/ farming activities.	Disallow in Part
Primary Land Users Group	PC1-11157	Policy 10	AMEND Policy 10 to reflect the regional significance of primary production sectors.	Oppose	The Regional Policy Statement recognises regionally significant infrastructure and regionally significant industry. Policy 10 gives effect to the direction of the Regional Policy Statement to the extent necessary to reflect the support primary production provides for regionally significant activities.	Disallow Submission
Reeves, John	PC1-876	Policy 10	RETAIN Policy 10 and AMEND so that PPC1 recognises agriculture as a regionally significant industry.	Oppose	The Regional Policy Statement recognises regionally significant infrastructure and regionally significant industry. Policy 10 gives effect to the direction of the Regional Policy Statement to the extent necessary to reflect the support primary production provides for regionally significant activities.	Disallow Submission

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
Robson, Angus Save Lake Karapiro Inc.	PC1-4009 PC1-5693	Policy 10	AMEND Policy 10 so that all infrastructure should be in play for mitigations which are effective, provided this does not force the infrastructure to be unfit for purpose.	Oppose	Genesis opposes this submission point as the matters the submitter is concerned about are appropriately addressed through other Regional Plan and resource consent provisions.	Disallow Submission
Patricia Balle Carol Buckley Bruce Cameron Mathew Denzie Sydney Goodright Gavin Holmes Daniel Jefferis Andrea Logan David MacKenzie Mark Muir David & Lisa Munro C & V Nicholson Jessica Roberts L Shaw & B Hall M & R Twining Richard Walker Woodacre Partnership D, L & Y Yule	PC1-4478 PC1-1403 PC1-6352 PC1-7637 PC1-4382 PC1-4573 PC1-6828 PC1-12268 PC1-3191 PC1-6871 PC1-2033 PC1-3941 PC1-7175 PC1-2623 PC1-6792 PC1-6733 PC1-4230 PC1-11537	Policy 10	AMEND PC1 to be holistic and include all sources of contaminant for example koi carp, point source discharges and hydro dams.	Oppose	Plan Change 1 was promulgated primarily to control the effects of diffuse discharges of key contaminants. In this regard, it is appropriate that the policy framework focus on diffuse discharges, with additional provisions relating to point source discharges, to be read and considered in conjunction with the existing provisions in the Waikato Regional Plan. In this regard, Genesis opposes the submission point raised by the submitters.	Disallow Submission
Wairakei Pastoral Limited	PC1-11350	Policy 10	AMEND Policy 10 to read: "Policy 10: Provide for <u>diffuse or</u> point source discharges of regional significance... When deciding resource consent applications for <u>diffuse or</u> point source discharges... b. Continued operation and development of regionally significant industry <u>and primary production</u> ."	Oppose	The Regional Policy Statement recognises regionally significant infrastructure and regionally significant industry. Policy 10 gives effect to the direction of the Regional Policy Statement to the extent necessary to reflect the support	Disallow Submission

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
					primary production provides for regionally significant activities.	
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges/Te Kaupapa Here 11: Te whakahāngai i te Kōwhiringa ka Tino Taea me ngā mahi whakangāwari pānga; te karo rānei I ngā pānga ki ngā rukenga i ngā pū tuwha						
Auckland/ Waikato Fish and Game and Eastern Region Fish and Game Council	PC1-10887	Policy 11	AMEND Policy 11 to read: " ...Where it is not practicable to avoid or mitigate all adverse effects <u>all adverse effects cannot be reasonable avoided, they should be mitigated, and where they cannot reasonably be mitigated, an offset measure may should be proposed in an alternative location or locations to the point of discharge...</u> provided that the: a. Primary discharge does not result in any significant <u>or</u> toxic adverse effects at the point of discharge location; and ... d. Offset measure remains in place for the duration of the consent and is secured by consent condition <u>and, if necessary, a bond in order to ensure it is achieved and maintained in the long term preferably in perpetuity; and</u> e. Offset measure results in a predicted net decrease of the contaminant in the receiving environment."	Oppose	Genesis considers that Policy 11 as notified provides flexibility for consideration of the need to avoid, mitigate or offset adverse effects to the degree and extent relevant to a particular activity. In that regard, Genesis does not support provisions that would make avoiding adverse effects or offsetting mandatory requirements, nor does it support fettering what offsetting could encompass in any given situation more than what is already recognised in Policy 11.	Disallow Submission
Contact Energy	PC1-7380	Policy 11	AMEND wording of Policy 11 from "all adverse effects" to "any significant adverse effect" AND ENSURE that all adverse effects of a point source discharge are not required to be avoided, mitigated or offset AND AMEND to allow existing and low discharging activities to continue or to be established for both point source and diffuse source discharges.	Support	For the reasons outlined in Genesis' primary submission.	Allow Submission

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
Maniapoto Maori Trust Board						
Maungatautari Marae						
McLean, Parekawhia	PC1-9212					
Ngaati Tamaoho Trust Te Taiao	PC1-11740					
Roopuu	PC1-11889					
Ngati Haua Iwi Trust	PC1-11587					
Poohara Marae	PC1-11839					
Potini Whaanau	PC1-12015					
Raukawa Charitable Trust	PC1-11691		AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects to <u>from</u> point source discharges..."			
Te Arawa River Iwi Trust	PC1-10555	Policy 11	Require any person undertaking a point source discharge... effects of the discharge at the time a resource consent application is decided . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to lessen any <u>by offsetting</u> residual adverse effects of the discharge..."	Oppose in Part	While Genesis supports the intent of the submission in ensuring that point source discharges are appropriately managed, Genesis supports the wording of Policy 11 as proposed in Genesis' primary submission. Specifically, ensuring "net" positive effects significantly extends the requirements on consent holders past the RMA requirements to avoid, remedy and / or mitigate effects. In that regard, Genesis considers that this policy should not require all residual effects to be offset as proposed by the submitters. Genesis considers that an offset should be proposed by the applicant and utilised to lessen any significant residual effect that remain after options to avoid, remedy and / or mitigate those effects have been explored.	Disallow Submission in Part
Te Awamaarahi Marae Trustees	PC1-11788					
Te Kauri Marae	PC1-11980					
Te Runanga o Ngati Kea Ngati Tuara Trust	PC1-11637					
Te Taniwha o Waikato	PC1-12249					
Te Whakakitenga o Waikato Incorporated (Waikato-Tainui)	PC1-12064					
Turangawaewae Marae	PC1-7884					
	PC1-12192					
	PC1-10339					
	PC1-12128					
	PC1-11970					
	PC1-3349					

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
Tuwharetoa Maori Trust Board Waahi Pa Marae Committee Waahi Whaanui Trust Waikato and Waipa River Iwi						
Tuakau Proteins Limited	PC1-3331		AMEND Policy 11 and any related schedules and objectives to avoid any interpretation that the obligation to avoid, remedy or mitigate the adverse effects of a point source discharge is greater than or extends beyond application of the Best Practicable Option as determined at the time an approval is obtained.	Support	For the reasons outlined in Genesis' primary submission.	Allow Submission
Oji Fibre Solutions (NZ) Limited	PC1-6547	Policy 11	AMEND Policy 11 to make it clear that the adoption of the Best Practicable Options is the principal mechanism for achieving Objective 3. AND AMEND Policy 11 to make it clear that an offset is not additional to but may form part of the Best Practicable Options. AND AMEND Policy 11 to make clear that the discharge/activity will not require a ten percent or any other standardised numeric reduction in discharges towards the long term water quality improvements as indicated by the short term water quality attribute targets in Table 3.11-1 as an obligation additional to the adoption of the Best Practicable Options.	Support	For the reasons outlined in Genesis's primary submission.	Allow Submission

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
Pamu Farms of New Zealand	PC1-5848	Policy 11	<p>AMEND Policy 11 to provide a new policy for a systematic review of point source and their seasonal effects on water quality. Include ranked and prioritised sites, to offer alternative land and funding. All catchment community to fund, including Agri-community/processing industries.</p> <p>OR ADD a NEW Policy and Rules for systemic S.128 review of all existing discharge permits over the term of PPC1.</p>	Oppose	This submission seeks that PC1 includes a new policy requiring review of point source discharges. This is inappropriate given that such point source activities are subject to defined consent durations, the significant investment in consenting these discharges and ongoing monitoring and mitigation required by consent conditions. It is also noted that the need to obtain consent typically results in significant contaminant reduction being required by WRC through each successive consent renewal. Consents for point source discharges also already have review clauses therefore WRC has the ability to review (even without policy support in PC1).	Disallow Submission
Watercare Services Ltd	PC1-8122	Policy 11	<p>RETAIN Policy 11.</p> <p>AND AMEND to be consistent with the RMA by relating the requirements for Best Practical Option to consideration of options to determine the best practicable one to prevent or minimise adverse effects.</p> <p>AND AMEND to be consistent with the RMA by relating the requirements for offsetting to residual effects that are significant adverse effects.</p>	Support	For the reasons outlined in Genesis' primary submission.	Allow Submission
Policy 12 - Policy 12: Additional considerations for point source discharges in relation to water quality targets/Te Kaupapa Here 12: He take anō hei whakaaro ake mō ngā rukenga i ngā pū tuwha e pā ana ki ngā whāinga ā-kounga wai						
Auckland/Waikato Fish and Game and Eastern Region Fish and Game	PC1-10888	Policy 12	<p>REMOVE the word 'Additional' from the Policy 12 title AND REPLACE Policy 12 with the following:</p> <p>"Impose conditions and discharge standards on point source discharges to ensure that the reduction targets and timeframes in Tables 3.11-1 and 3.11-2, and the sub-catchment nitrogen leaching reductions in Schedule E, can be met, based on a consideration of the contribution made by the discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads, and having regard to:</p>	Oppose	Genesis does not consider the wording proposed by Fish and Game to be appropriate and seeks that the notified version of Policy 12 be retained.	Disallow Submission

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
			<p>a. The relative proportion of nitrogen, phosphorus, sediment and microbial pathogens that the particular point source discharge contributes to the catchment; and</p> <p>b. Whether it is appropriate to stage future mitigation actions to allow investment costs to meet the water quality targets specified above to be spread over time.</p> <p>c. The need to favour caution and environmental protection where the information available is uncertain or inadequate."</p>			
Maniapoto Maori Trust Board	PC1-9290					
Maungatautari Marae	PC1-11741					
McLean, Parekawhia	PC1-11890					
Ngaati Tamaoho Trust	PC1-11588					
Te Taiao Roopuu	PC1-11840					
Ngati Haua Iwi Trust	PC1-12016					
Poohara Marae	PC1-11692					
Potini Whaanau	PC1-10556					
Raukawa Charitable Trust	PC1-11789					
Te Arawa River Iwi Trust	PC1-11983	Policy 12	<p>AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen catchment loads <u>within a sub catchment</u> and the impact of that contribution on the <u>likely</u> achievement of the...</p> <p>d. The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*."</p>	Oppose in Part	<p>While Genesis supports the intent of the submission in ensuring that point source discharges are appropriately managed, Genesis supports the wording of Policy 12 as notified. Specifically, Genesis is concerned with the proposed deletion of clause d. It is considered that clause d. Submission appropriately recognises that there are situations where it is not practicable to install additional treatment technology if the existing plant process are achieving the best practicable option.</p>	Disallow in Part
Te Awamaarahi Marae Trustees	PC1-11638					
Te Kauri Marae	PC1-12250					
Te Runanga o Ngati Kea Ngati Tuara Trust	PC1-12065					
	PC1-7931					
	PC1-12193					
	PC1-10343					
	PC1-12131					
	PC1-11973					
	PC1-3353					

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
Te Taniwha o Waikato Te Whakakitenga o Waikato Incorporated (Waikato-Tainui) Turangawaewae Marae Tuwharetoa Maori Trust Board Waahi Pa Marae Committee Waahi Whaanui Trust Waikato and Waipa River Iwi						
Robson, Angus Save Lake Karapiro Inc.	PC1-4010 PC1-5724	Policy 12	AMEND Policy 12 so that all infrastructure should be in play for mitigations which are effective, provided this does not force the infrastructure to be unfit for purpose.	Oppose	Genesis opposes this submission point as the matters the submitter is concerned about are appropriately addressed through other Regional Plan and resource consent provisions.	Disallow Submission
Policy 13: Point sources consent duration/Te Kaupapa Here 13: Te roa o te tukanga tono whakaaetanga mō te pū tuwha						
Auckland/Waikato Fish and Game and Eastern Region Fish and Game	PC1-10900	Policy 13	DELETE Policy 13 OR AMEND to read: "Point source consent duration When determining an appropriate duration for any point source consent granted consider the following matters: a. <u>Alternative methods of discharge, technology improvements or other changed circumstances that may arise in the future;</u> A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policies 11 and 12 will be met; and	Oppose	Genesis supports the wording of Policy 13 as notified and it incorporates relevant considerations with respect to consent duration.	Disallow Submission

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
			<p>aa. <u>The sensitivity of the receiving environment and the adequacy/certainty of information that is available; and</u></p> <p>ab. <u>The applicant's past record of responsiveness to adverse effects including past technology upgrades undertaken to model, monitor and reduce the discharge of nitrogen, phosphorus, sediment or microbial pathogens within the previous consent term and their success; and</u></p> <p>b. The magnitude and significance of the investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality;</p> <p>c. The need to provide appropriate certainty of investment where <u>substantial</u> contaminant reduction measures are proposed (including investment in treatment plant upgrades or land based application technology)."</p>			
Maniapoto Maori Trust Board	PC1-9300					
	PC1-11742					
Maungatautari Marae	PC1-11891					
	PC1-11589					
McLean, Parekawhia	PC1-11841					
	PC1-12017					
Ngaati Tamaoho Trust Te Taiao	PC1-11693					
	PC1-10558		AMEND Policy 13 to read: "When determining the...			
Ngati Haua Iwi Trust	PC1-11790	Policy 13	a. A consent term exceeding 25 years, where The applicant demonstrates the approaches..."	Oppose in part	While Genesis supports the intent of the submission in ensuring that point source discharges are appropriately managed, Genesis supports the wording of Policy 13 as notified as it incorporates relevant considerations with respect to consent duration. Genesis considers that the policy as notified, including a minimum consent duration, provides an appropriate incentive to ensure that point source discharges achieve the outcome sought by PC1, and meet the best practicable option requirements.	Disallow Submission in part
	PC1-11984					
Poohara Marae	PC1-11639					
Potini Whaanau	PC1-12251					
Raukawa Charitable Trust	PC1-12066					
	PC1-7963					
Te Arawa River Iwi Trust	PC1-12194					
	PC1-10354					
Te Awamaarahi Marae Trustees	PC1-12133					

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
Te Kauri Marae Te Runanga o Ngati Kea Ngati Tuara Trust Te Taniwha o Waikato Te Whakakitenga o Waikato Incorporated (Waikato-Tainui) Turangawaewae Marae Tuwharetoa Maori Trust Board Waahi Pa Marae Committee Waahi Whaanui Trust Waikato and Waipa River Iwi	PC1-11974 PC1-3403					
Mercury NZ Ltd	PC1-9577	Policy 13	AMEND Policy 13 to read: "When determining an appropriate duration for any consent granted for <u>point source discharges</u> , consider the following matters:..."	Support	Genesis supports Mercury's proposed amendment to make it explicit that this policy is specific to point source discharges.	Allow Submission
The Royal Forest and Bird Protection Society of New Zealand Incorporated	PC1-8325	Policy 13	AMEND Policy 13 to read as follows: "Policy 13: Point sources consent duration. When determining an appropriate duration for any consent granted consider the following matters: a. A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policies 11 and 12 will be met; and whether the applicant demonstrates that the	Oppose	Genesis supports the wording of Policy 13 as notified and it incorporates relevant considerations with respect to consent duration.	Disallow Submission

Submitter	Sub Point #	Plan Change Provision	Relief Sought	Support / Oppose	Reason	Relief Sought
			<p><u>discharge is consistent with the water quality attribute targets set out in Table 3.11-1;</u></p> <p>b. the magnitude and significance of the investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality; and c. the need to provide appropriate certainty of investment where contaminant reduction measures are proposed (including investment in treatment plant upgrades or land based application technology)."</p>			
Definitions						
Hamilton City Council	PC1-10208	Glossary of Terms – regionally significant infrastructure	AMEND to include a definition for 'regionally significant infrastructure' in PPC1, similar to the definition in the Regional Policy Statement (2016).	Support	Genesis supports the definition in the Waikato Regional Policy Statement for 'regionally significant infrastructure' and considers that it would be appropriate to use this definition in the Waikato Regional Plan.	Allow Submission
Watercare Services Ltd	PC1-8340	Glossary of Terms – regionally significant infrastructure	AMEND to include a definition for 'regionally significant infrastructure' in PPC1, similar to the definition in the Regional Policy Statement (2016).	Support	Genesis supports the definition in the Waikato Regional Policy Statement for 'regionally significant infrastructure' and considers that it would be appropriate to use this definition in the Waikato Regional Plan.	Allow Submission
South Waikato District Council	PC1-4056 PC1-9724	Glossary of Terms – regionally significant infrastructure	AMEND to include propose a definition for regionally significant infrastructure: "Regionally significant infrastructure means 'municipal wastewater treatment plants, water supply treatment plants and bulk water supply, wastewater conveyance and storage systems, municipal supply dams and ancillary infrastructure."	Support in Part	While Genesis supports the intent of this submission point, the definition promoted by South Waikato District Council is not sufficiently broad to give effect to the Regional Policy Statement definition of "Regionally Significant Infrastructure", which includes electricity generation infrastructure. It would be appropriate to use the Waikato Regional Policy Statement definition in the Waikato Regional Plan.	Allow in Part