

Further Submission on Proposed Regional Plan Change 1 and Variation 1 of Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments

Full Name of Submitter: Genetic Technologies Ltd

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Genetic Technologies Ltd represents a relevant aspect of the public interest. Genetic Technologies Ltd represents arable and cropping farmers who reside in the area affected by Proposed Plan Change 1.

We wish to speak at the hearing in support of our further submission.

Please find attached to this email our further submission (17 pages)

If you have any questions regarding this further submission, please do not hesitate to contact me.

Ian Williams

17 September 2018

Genetic Technologies Ltd Submitter ID: 73953– Further Submissions – WRC Proposed Plan Change 1

Submitter	Submission Point	Support/Oppose	Reason
Auckland/Waikato Fish and Game Submitter ID: 74085	PC1-11003	Oppose	Lack of definition on what is disturbed land. Does not allow for other mitigations. Contrary to the intent of the RMA and PC1 and no assessment of the impact of the receiving environment.
Beef and Lamb New Zealand Limited Submitter ID: 73369	PC1-11500	Oppose in part	Oppose the introduction of allocation in this Plan Change. This Plan Change is transitional and to gather a greater understanding of land use in the catchment from which to make more informed decisions in future Plan Changes of which allocation is one toll that may be considered.
Department of Conservation Submitter ID: 71759	PC1-11054	Oppose	In particular oppose the proposal to exclude stock from ephemeral waterbodies as would severely impact farm management systems. Further any discharges from ephemeral systems can be adequately managed prior to entering a permanent water body if necessary.
Gleeson, Graeme B Submitter ID: 73800	PC1-6410	Support in Part	Support that Good Management Practices as recognised by industry should be adopted. GMP's can be different for each industry and need to be used to ensure effective and sustainable outcomes Support that FEP's be tailored to each farm or enterprises individual approach Support that FEP's mitigations to each contaminant are relevant to each farm rather than a blanket approach
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-7776	Support in Part	Support the submission in particular the removal of capping of land but consider that it should apply to arable as well as vegetable growing
Alcock and Easton, Jo and John Submitter ID:73374	PC1-9218	Support in Part	Support the proposal in part. In particular to ensure there's is sufficient flexibility and recognition of different farming systems.
Ata Rangī 2015 Limited Partnership Submitter ID: 74045	PC1-6192	Support in part	Support the amendment to increase the slope where grazing may occur as a permitted activity to 23 degrees
Auckland/Waikato Fish and Game Submitter ID: 74085	PC1-10997	Oppose and support	Oppose the deletion of 3.11.5.2(4)(b)(i) and limiting nitrogen contaminant loss to 15kg/N/ha/yr to be a permitted activity as far too restrictive given nitrogen is one of 4 contaminants and in many subcatchments is not the primary contaminant of concern. Support the deletion of 3.11.5.2(4)(c)

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Submitter	Submission Point	Support/Oppose	Reason
Balance Agri-Nutrients Limited Submitter ID: 74036	PC1-6901	Support in part	Support that there should be flexibility in the grazing of slopes greater than 15 degrees as a permitted activity where any contaminant losses are managed and prevented from entering waterbodies
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10621	Support	Support that there should be flexibility in the grazing or cultivating of slopes greater than 15 degrees as a permitted activity where any contaminant losses are managed and prevented from entering waterbodies
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10492	Oppose	Oppose limiting nitrogen loss calculations to the grazed or cropped area rather than the total area of the property.
Pinnell, Graham Submitter ID: 74007	PC1-4422	Support	Support the use of BMP to manage nitrogen leaching
Ravensdown Limited Submitter ID: 74058	PC1-10140	Support	Support the submission in particular the provision of greater certainty for land users
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8425	Oppose	Oppose that the land use provisions are restricted to 22 October 2016. Stocking rate should be an annualised average. Also oppose that non-compliance defaults to a non-complying rule.
Waikato Regional Council Submitter ID: 72890	PC1-3117	Support in part Oppose in Part	Support the amendments that provide clarity and certainty. Seek that for the proposed amendment to 3.11.5.2(4)(b)(ii) that any intensity proxy is developed in consultation with sectors and stakeholders.
Advisory Committee on Regional Environment (ACRE) Submitter ID: 71238	PC1-11208	Oppose in Part	Oppose the use of Overseer in cases where Overseer has been shown to be highly unreliable if it provides a result at all.
Auckland/Waikato Fish and Game Submitter ID: 74085	PC1-10999	Oppose	Oppose the submitters proposal to focus on nitrogen. Nitrogen is only one of four contaminants and in many cases is not the contaminant causal to water quality degradation
Hancock Forest Management NZ(Ltd) Submitter ID: 73724	PC1-5774	Support in Part Oppose in Part	Support the proposal that farming activities be permitted subject to meeting Best Practicable Option. Oppose including minimum standards as a blunt tool and removes applying mitigations most suited to the issues to be addressed and farm management practices of the different sectors

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Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8113	Oppose	Oppose submission unless consideration is given to having Best Management Practices and standards that are reflective of different land uses.
Pinnell, Graham Submitter ID: 74007	PC1-4374	Support in Part	Support that PC1 needs to focus on all four contaminants not just nitrogen Support the recognition of experimental learning and adaptive management especially for those land uses where there has been limited research in relation to environmental impacts.
Strang and Strang Limited Submitter ID: 73851	PC1-5571	Support in Part Oppose in Part	Support the proposal that farming activities be permitted subject to meeting Best Practicable Option. Oppose including minimum standards as a blunt tool and removes applying mitigations most suited to the issues to be addressed and farm management practices of the different sectors
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8208	Oppose	Oppose that non-compliance with 3.11.5.4 is a non-complying activity rather than restricted discretionary
Waikato Regional Council Submitter ID: 72890	PC1-3420	Oppose in Part Support in Part	Oppose the use of Overseer in cases where Overseer has been shown to be highly unreliable if it provides a result at all. Support that the NRP is a yardstick to indicate relative loss on N(trend) However this appears inconsistent with proposed provision that N loss is not to exceed the NRP Support that can reassign NRP entitlements when new land is incorporated into a property. However, appears inconsistent with the proposal to remove the ability that a NRP can be held by an enterprise and can only exist in association with a particular parcel or property. Consider that if an enterprise has all its parcels within a subcatchment that it should be able to hold a single NRP.
Auckland/Waikato Fish and Game Submitter ID: 74085	PC1: 11001	Oppose	Oppose proposal for 3.11.5.6 to be non-complying activity. Retain restricted discretionary.
Department of Conservation Submitter ID: 71759	PC1-11058	Support	Support the submission

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Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10506	Oppose	Oppose the submission to make 3.11.5.6 a discretionary activity as this allows consideration of other matters not related to PC1. Retain restricted discretionary activity status and consider amending matters of discretion if it can be shown there are valid omissions for consideration.
Ravensdown Limited Submitter ID: 74058	PC1-10156	Support	Support the submission
Auckland/Waikato Fish and Game Submitter ID: 74085	PC1-11002	Oppose	We do not consider notification is necessary and will only serve to delay decisions and increase costs for parties and not improve the environmental outcome
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6867	Support	Support Rule 3.11.5.7 being a discretionary activity
DairyNZ Submitter ID: 74050	PC1-10247	Support in Part	Support the advice note. However, consider in such cases where contaminant discharges will not increase should be a discretionary activity
Department of Conservation Submitter ID: 71759	PC1-11059	Oppose	Oppose any consideration of 3.11.5.7 being a prohibited activity as provides no avenue for consideration of land use changes where there is no increase in contaminants or will provide decreases in contaminant discharges.
Ravensdown Limited Submitter ID: 74058	PC1-10161	Support in Part	Support that 3.11.5.7 is limited to where land use change will result in an increase of contaminant discharges. However, will need consequential amendment to 3.11.5.6 or a new rule that allow for land use change where the contaminant discharge will decrease or remain at the same level as the existing activity.
Waikato Regional Council Submitter ID: 72890	PC1-3480	Support in Part	Support the amendment to exclude land use change within a property or enterprise.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6915	Support	Support, in particular clarification required in regards what registration information is to be updated and how frequently
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8740	Support	Support the submission that information to be collected is to be the preceding year. By the time collection of information for Schedule A is required could well be four or more years since 2016 and for lifestyle blocks, in particular there could have been more than one change of ownership. Also, in smaller blocks record keeping is unlikely to be adequate to provide accurate historical information and therefore the data would not be at all accurate.

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The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8449	Oppose	Oppose as Schedule A is about registration and gathering information. Other provisions in PC1 determine actions that are required to be undertaken if necessary. Also consider that information gathered should be for the year preceding the registration date rather than 22 October 2016.
DairyNZ Submitter ID: 74050	PC1-10254	Support in Part	Support the amendment to clarify that the original data set is used to determine the NRP when there is a new version of Overseer issued.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10517	Support in Part	Support the amendment to clarify that the original data set is used to determine the NRP when there is a new version of Overseer issued.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10190	Support	Support the submission and recognition that alternative models to Overseer be considered to Overseer in determining the NRP
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-9841	Support in Part	Support the need for alternatives to the Overseer model for land uses where Overseer will not provide a valid result. Also support a better recognition on the limitations of using Overseer as a regulatory tool
Waikato Regional Council Submitter ID: 72890	PC1-3553	Oppose Oppose in Part Support	Oppose the submission to remove the ability for an enterprise to hold a NRP. Alternatively amend so that only enterprises that land parcels are in the same catchment can hold a NRP. Support that the NRP only needs to be approved by a CFNA Oppose in part to amend highest annual leaching loss to a single financial year as this does not provide clarity with the financial year being dependent on the business structure and operation. Oppose as need to recognise that Overseer is not a suitable model for some systems.
Ata Rangī 2015 Limited Partnership Submitter ID: 74045	PC1-6239	Support in Part	Support seeking greater certainty. However, that certainty needs to reflect that it provides for different mitigation requirement for different sectors.
Ballance Agri-Nutrients Limited Submitter ID: 67834	PC1-7105	Support in Part	Support to provide flexibility and managed in accordance with Good Management Practices but GMP's need to be appropriate to each sector.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1 - 11508	Support in Part	Support to provide flexibility and managed in accordance with Good Management Practices but GMP's need to be appropriate to each sector.

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Department of Conservation Submitter ID: 71759	PC1-10647	Oppose	Oppose the proposed increase of setbacks. The FEP provides for an assessment of risks which may or may not require increased setbacks depending on the situation. Oppose the requirement so that it applies to intermittent and ephemeral waterbodies. For smaller properties such a requirement is likely to make management of that property not viable and consider contaminants arising can be managed by other means through the FEP process.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10650	Support Oppose in Part	Support the submission except that in the management of nitrogen loss another mechanism other than Overseer needs to be provided for sectors where it has been shown that Overseer does not provide reliable results.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5789	Oppose	Oppose the requirement that BPO's to be implemented immediately and timing needs to reflect the environmental risk and the costs of implementation. Oppose the inclusion and expansion of specific actions to be undertaken as undermines the integrity of a FEP that is to provide for flexibility and to include actions that are the most effective and efficient for that property. Also need to recognise actions are also likely to be sector specific.
Parker, Michael David Submitter ID: 73181	PC1-9278	Support	Support the submission including allowing farmers to develop their own FEP that is reviewed by a CFEP. Support allowing cultivation on sloped over 15 degrees where there are mitigations to manage risks. Support allowing cultivation closer than 5m from waterbodies where there are mitigations to manage risks
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8201	Oppose	Oppose to require reductions in all cases, specifically where that contaminant is not an issue, and/or the land use is already undertaking GMP. Oppose the inclusion and expansion of specific actions to be undertaken as undermines the integrity of a FEP that is to provide for flexibility and to include actions that are the most effective and efficient for that property. Also need to recognise actions are also likely to be sector specific. Oppose the mandatory inclusion of matters in the FEP that do not relate to PC1, notwithstanding that a land owner may include such matters if they so choose.
Waikato Regional Council Submitter ID: 72890	PC1-3575	Oppose in Part Support in Part	Support deletion of minimum standards in PC1 or the amendment to reflect the standards as BMP rather than firm requirements.

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			Oppose the use of Overseer unless there is provision for other methods for sectors where it is shown that Overseer does not provide a valid result. Oppose the deletion of “unless other suitable mitigations are specified.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11389	Support in Part	Support the inclusion of other models other than Overseer to determine NRP and nutrient budgets but needs to be expanded to include other mechanisms or proxy's where it can be shown that current models are not suitable for a particular sector.
Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1548	Oppose	Oppose the submission. Oppose that ephemeral streams be included in PC1 Oppose that all wetlands be specifically listed not just significant wetlands Oppose that game bird values be specifically included over and above general recreational values. Consideration of natural values is outside the scope of PC1
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1707	Support in part	Support taking a holistic approach to discharges rather than a single activity focus.
Department of Conservation Submitter ID: 71759	V1PC1-1698	Oppose in Part	Oppose the submission Oppose the submission to have greater regulation in PC1 Oppose that Whangamarino wetland have a separate FMU Oppose the introduction of an allocation regime in PC1.
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-788	Oppose	Oppose that low emitters as per Rule 3.11.5.2 over 20ha will be required to submit a FEP albeit simplified when the identified risks of discharges are low.
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-801	Support in Part	Support the recognition that for some farm types Overseer is not a suitable model. However, in developing the Nitrogen Risk Scorecard as an alternative need to recognise that different assessments/proxy's will be required for different farm types. If NRS is to proceed input from industry stakeholders will be required.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-971	Support in Part	Support the submission noting it needs to reflect similar issues for arable.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-984	Support in Part	Support the submission noting it needs to reflect similar issues for arable.

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Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1558	Oppose	Do not consider a specific objective for wetland other than Whangamarino needs to be included as already addressed within PC1 provisions.
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1656	Support in Part Oppose in part	Agree that the opportunity for subcatchment groups should be provided for if it can be shown there is not already the appropriate mechanisms in PC1. Oppose the introduction of N allocation frameworks in this Plan Change. More land use information is required to determine appropriate mechanisms that may or may not be allocation. Agree with Objectives that encourage resilience and future proofing communities while achieving the water quality objectives.
Department of Conservation Submitter ID: 71759	V1PC1-997	Oppose	Do not consider necessary as PC1 already addresses water quality issues in regard to the catchment and that includes wetlands
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1657	Support	Support the proposal to have Objective 1 recognising and providing for the Values identified in 3.11.1
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-122	Support	Support the proposed amendments including the recognition of maintenance where it can be shown the water quality already meets the desired values
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-126	Support	Support the amendments to Objective 2 as proposed by the submitter
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1361	Support	Support the amendments to Objective 2 as proposed by the submitter
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-129	Support	Support the recognition that for some subcatchments maintenance may be sufficient in achieving both the short and long-term water quality objectives.
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1362	Support in Part	Support but requires further clarification that the actions being completed in 10 years to improve water quality by 10 percent may require a longer timeframe to be reflected in an actual 10 percent improvement
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-143	Support	Support the proposed amendments in particular providing for flexibility in the implementation of on farm management measures.

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Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1602	Support in Part	Support the recognition that this Plan Change is transitional to provide time to develop the necessary tools and frameworks
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-149	Support in Part	Support the amendment to the Objective to relate to the Visions and Strategy and the identified values
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-172	Support	Support the proposed amendments in particular that the actions are tailored and designed to fit the specific circumstances of the farming enterprise such as arable.
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-175	Support in Part	Support the proposals but require further clarification in regard to the adoption of the Most Practicable Action
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-240	Support	Support the amendments to introduce a new policy as proposed by the submitter
Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1561	Oppose	Oppose the use of allocation in the Plan Changes when there is insufficient information to make such an assessment
Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1590	Oppose	Oppose the proposal to increase the riparian margins to all waterways without any assessment that if it appropriate or necessary to do so in achieving improved water quality outcomes
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1661	Oppose in Part	Oppose the introduction of N allocation frameworks in this Plan Change. More land use information is required to determine appropriate mechanisms that may or may not be allocation.
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-162	Support in Part	Support the proposed amendment but seek further clarity on Most Practicable Actions and its application.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1629	Support in Part	Support the opportunity to mitigate discharges by either on or off farm actions
Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1592	Oppose	Riparian margins in only one tool to prevent or mitigate sediment discharges and should not be promoted over other options which may be more effective and efficient depending on land use.

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Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1670	Oppose	Oppose the proposal by the submitter as currently do not have the information on land use and management practices to make an informed decision
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1671	Support	Support the incentivisation and support for collaborative community groups to work together
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-164	Support in Part	Support but seek further clarity on Most Practicable Actions and its application.
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-748	Support in Part	Support but seek further information on the Nitrogen Risk Scorecard and the development of proxy's that would be suitable for arable enterprises
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1595	Support in Part	Support to the extent that the proposal applies to arable enterprises. In particular multiple parcels of land including lease land as well as recognising the differences between pastoral and cropping regimes
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-188	Support	Support for the reasons provided by the submitter
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-193	Support	Support the amendment to the Policy to relate to the Visions and Strategy and the identified values
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1365	Support	Support the proposed amendments for the reasons given by the submitter
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1349	Support	Support the proposed amendments for the reasons given by the submitter
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1353	Support	Support the proposed amendments, in particular further research that will provide a greater understanding of discharges from arable properties.
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1350	Oppose	While Fonterra may have the capacity and financial resources to enable its farmers to have a completed FEP by 2020 other sectors do not. Even if the cost of completing FEPs is not a consideration
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-234	Support	Support the amendment to apply to all discharges not just diffuse discharges in relation to subcatchment approaches

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Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1634	Support	Support the proposed amendments to the policy on subcatchment approaches
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-244	Support	Support the proposed amendments to the policy on Lakes Freshwater Management Units
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-245	Support	Support the proposed amendments to the policy on Whangamarino wetland
Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1544	Oppose	Oppose the initiation of an allocation framework to be implemented in this Plan Change as there is insufficient information available to do so. A primary aim of this Plan Change is to gather more robust and detailed information of what is happening on land in the catchment to enable better decision making in future plan changes that may or may not require an allocation regime
Raukawa Charitable Trust Submitter ID: 74073	V1PC1-1253	Support	Support the implementation of a decision support system if it assists in better use of resources and effective outcomes
Federated Farmers of New Zealand Submitter ID: 74191	ViPC1-257	Support	Support the retention of method 3.11.4.1
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-259	Support in Part	Support in part especially the recognition of flexibility required for FEP's including sector differences. Support in developing guidance that WRC consults with stakeholders and industry bodies
Raukawa Charitable Trust Submitter ID: 74073	V1PC1-1256	Oppose in Part	Oppose that WRC will specify the range of mitigations as this will limit the opportunity for the use of mitigations not identified but provide equal or better outcomes especially in sector as that council has given little consideration of e.g. the arable sector. Consider any listing of mitigations by council should be guidance only.
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-266	Support	Support the proposed amendments to 3.11.4.5 as provides clarity and certainty.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1636	Support	Support the proposal for the development of decision support tools to be included

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Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1573	Oppose	Oppose the proposal for funding based on the sensitivity of the receiving environment
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-294	Support	Support for the reasons given by the submitter
Auckland/Waikato Fish and Game Submitter ID: 74085	VC1PC1-1574	Oppose	Oppose the introduction of allocation in this Plan Change. A primary aim of this Plan Change is to gather more robust and detailed information of what is happening on land in the catchment to enable better decision making in future plan changes that may or may not require an allocation regime
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-295	Support	Support the proposed amendments to remove the inference that an allocation regime will be introduced. A primary aim of this Plan Change is to gather more robust and detailed information of what is happening on land in the catchment to enable better decision making in future plan changes that may or may not require an allocation regime
Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1575	Oppose	Oppose the proposed amendments that infer there is to be an allocation of nutrient discharges included in this Plan Change
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-300	Support	Support the proposed amendments to remove the inference that an allocation regime will be introduced. The use of further tools and mechanisms including allocation to manage contaminant losses to water can only be determined after the information that is being gathered through this Plan Change has been analysed.
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-308	Support	Support the proposed amendments to 3.11.4.11 and that includes all sources of contaminants to water
Federated Farmers of New Zealand Submitter ID: 74191	VC1PC1-312	Support	Support the inclusion of collaboration and consultation with industry and stakeholders and that it should include stakeholders in the arable sector. In particular the new paragraph in regard to Overseer.
Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1582	Oppose	Oppose the introduction of prohibited activity status for discharge of sediment and consider the proposal unworkable.
Department of Conservation Submitter ID: 71759	V1PC1-418	Oppose	Oppose as not practical to enforce Rule that is still open to challenge

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Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-765	Oppose in Part Support in Part	Support in part the proposal to introduce a Nitrogen Risk Scorecard (NRS) as an alternative to providing a NRP. However, support is conditional on appropriate proxy's being able to be developed. Oppose the introduction of FEPs for properties for rule 3.11.5.2 as essentially makes the compliance requirements the same as for rules 3.11.4.3 and 3.11.5.4 and 3.11.5.2 was for properties that have been identified as being lower risk and therefore require less scrutiny.
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-357	Oppose in Part	Oppose the use of a five-year rolling average due to the proposed commercialisation of Overseer and the resulting costs to landowners to produce Overseer files
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-779	Oppose in Part	Oppose the use of a three-year rolling average due to the proposed commercialisation of Overseer and the resulting costs to landowners to produce Overseer files
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	V1PC1-1578	Oppose	Oppose the introduction of targets in relation to N losses when there is currently insufficient information available to do so. Further N is only one of four identified contaminants for the Waikato and Waipa Rivers and for most subcatchments the science has clearly shown that N is not the limiting factor Oppose that consent reviews will be subject to limited or public notification
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1664	Support in Part Oppose in Part	Support the proposal to amend to tailor mitigation to critical source identification and management, noting that sectors such as arable will have different issues and management to other pastoral sectors. Support the proposal that consents have a duration of 35 years Support the use of the Best Practicable option noting that these may be different for the different sectors
			Oppose the proposal for overallocated catchments in this Plan Change noting that this Plan Change is transitional and for getting better information to make appropriate contaminant management decisions. Support that consents be able to be grated for terms of 35 years
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-468	Oppose in Part	Oppose the use of a five-year rolling average due to the proposed commercialisation of Overseer and the resulting costs to landowners to produce Overseer files

Genetic Technologies Ltd Submitter ID: 73953– Further Submissions – WRC Proposed Plan Change 1

Submitter	Submission Point	Support/Oppose	Reason
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1725	Support in Part Oppose in Part	Generally, support the proposed submission however oppose the use of a three-year rolling average due to the proposed commercialisation of Overseer and the resulting costs to landowners to produce Overseer files
Waikato Regional Council Submitter ID: 72890	V1PC1-1516	Support Oppose	Support the amendments which provide greater clarity to the Rule intent Support the ability to re assign the NRP when land is incorporated into new property Oppose the deletion of “unless other suitable mitigations are specified” from 3.11.5.4(iii) as removes undermines the ability for a subcatchment approach or edge of field solutions Oppose the proposal for an enterprise to be able to hold a NRP and limit to only specific parcel or property
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-894	Support in Part	Support the alternative to a NRP to have a proxy farm system to approximate the nitrogen loss so long as this is available for land uses other than commercial vegetable growing such as arable and that there is stakeholder in put in the development of the proxy farms
Waikato Regional Council Submitter ID: 72890	V1PC1-1517	Oppose in Part	Oppose that the NRP cannot be held by an enterprise and must remain with a particular parcel of land. Consideration of the flexibility of land use for commercial vegetable production needs to be able to be provided to arable properties which have similar constraints with lease land and moving around the catchment.
Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1580	Oppose	Oppose the submission that 3.11.5.6 is a non-complying activity rather than restricted discretionary as consent decision should be limited to the four contaminants that contribute to the water quality of the Waikato and Waipa River catchments
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-572	Support Support in Part	Support the proposals in particular “the relative contribution of the industry sector” and the “characteristics of the subcatchment” Seek clarity as to the intent of adding new paragraph (vii)
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1351	Support in part Oppose in Part	Support the proposal to make the land use change Rule a discretionary activity however oppose the deletion of 3.11.5.6 Restricted discretionary activity. Oppose the use of a three-year rolling average due to the proposed commercialisation of Overseer and the resulting costs to landowners to produce Overseer files.

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Waikato Regional Council Submitter ID: 72890	V1PC1-1519	Support in Part	Support the proposal to exclude changes of land use that occur within properties
Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1539	Oppose	Oppose the Updated leaching assessment and the proposal that a rolling average will include all years in the review period.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1601	Support in Part	Support the submission but need to include arable as has similar constraints to commercial vegetable growing
Waikato Regional Council Submitter ID: 72890	V1PC1-1494	Oppose in part Support in part	Oppose the proposal for an enterprise to be able to hold a NRP and limit to only specific parcel or property Support that the NRP only needs to be approved by a CFNA rather than being calculated by a CFNA
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1686	Support in Part Oppose in Part	Support that Council identifies relevant water quality issues but consider that the sectors are better placed to identify the appropriate mitigations.
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1687	Support in Part	Support proposed amendments that provides more flexibility and mitigations are reflective of the specific issue.
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1689	Support	Support limiting to key critical source areas
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-766	Support in Part Oppose in Part	Oppose the definition of Most Practicable Option as do not consider it creates any greater clarity or certainty of intent Support the recognition of the relative contribution of the industry sector that the farm enterprise belongs Support in part the amendments to FEP requirements as long as there is an appropriate reflection of different sectors practices
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-895	Support in Part Oppose in Part	Oppose the use of a three-year rolling average due to the proposed commercialisation of Overseer and the resulting costs to landowners to produce Overseer files. Support in part the proposal to introduce a Nitrogen Risk Scorecard (NRS) as an alternative to providing a NRP. It has been shown that Overseer does reliable for

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			arable properties and a NRS could be an appropriate alternative. However, support is conditional on appropriate proxy's being able to be developed.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1646	Support in Part	Support the proposal in part to the extent that it applies to multiple block lease land and is also applicable to arable operations
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1647	Support in Part	Generally, support the proposal in particular the amendments to the minimum cultivation setback to allow for other mitigations where appropriate; and the inclusion of the term cultivate land
Waikato Regional Council Submitter ID: 72890	V1PC1-1537	Support	Support the deletion of some of the minimum standards or amendment of the minimum standards to best management practice
Waikato Regional Council Submitter ID: 72890	V1PC1-1538	Support	Support the proposed amendments to change the word avoided to minimised in regard to cultivation on slopes. Also support that appropriate mitigations be included so that the cultivation setback may be less than 5 meters.
Raukawa Charitable Trust Submitter ID: 74073	V1PC1-1272	Oppose	Oppose the inclusion for a definition of intermittently flowing river in that PC1 controls only relate to continually flowing waterbodies
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1148	Support in Part	Support the proposed amendments to CFNA in regard to agronomic knowledge and note that this needs to be applied to arable properties as well as commercial vegetable growing
Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1644	Support in Part	Support the proposed amendment to the term enterprise and note that this needs to be applied to arable properties as well as commercial vegetable growing
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-799	Oppose	Oppose the use of a five-year rolling average due to the proposed commercialisation of Overseer and the resulting costs to landowners to produce Overseer files.
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1372	Oppose	Oppose the use of a three-year rolling average due to the proposed commercialisation of Overseer and the resulting costs to landowners to produce Overseer files.
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-800	Support	Support the amendment to the definition Good Management Practice to include the term manage

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Horticulture New Zealand (HortNZ) Submitter ID: 73801	V1PC1-1645	Support in part	Support the submission but note that alternative methods to establishing a NRP include arable.
Waikato Regional Council Submitter ID: 72890	V1PC1-1532	Oppose in Part	Oppose the proposed amendment that the NRP be calculated using the current version Overseer. An alternative method should be able to be used if available and is shown to provide more reliable results