

FURTHER SUBMISSION FORM

IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION/S ON NOTIFIED:

PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS AND VARIATION 1 TO PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS



Save this PDF to your computer before answering. If you edit the original form from this webpage, your changes will not save. Please check or update your software to allow for editing. We recommend Acrobat Reader.

Council needs to receive your further submission by 5pm, Monday, 17 September 2018. Please read the notes on making a Further Submission at the end of this form before completing your submission.

IMPORTANT NOTE

A copy of your further submission must be served on the original submitter/s within 5 working days of being lodged with council. An address list of all submitters is included with the summary of decisions requested documents and is available at waikatoregion.govt.nz/healthyrivers

YOUR NAME, ADDRESS FOR SERVICE AND CONTACT DETAILS (MANDATORY INFORMATION)

Name of submitter (individual/organisation)	Miraka Limited	
Contact person (if applicable)	Grant Jackson General Manager Milk Supply	
Agent (if applicable)	Jude Addenbrooke, Addenbrooke Advisory Limited environment@addenbrooke.nz	
Email address for service	Grant.Jackson@miraka.co.nz	
Postal address for service	108 Tuwharetoa Street PO Box 740 Taupo	
		Post code: 3352
Phone number/s	Home:	Business: +64 7 376 0075
	Mobile: +64 21 647 160	Fax: +64 7 377 0694

IN ACCORDANCE WITH SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT:

I am:

- A person representing a relevant aspect of the public interest.
In this case, also specify the grounds for saying that you come within this category; or
- A person who has an interest in the proposal that is greater than the interest the general public has.
In this case, also explain the grounds for saying that you come within this category; or
- The local authority for the relevant area.

My reasons are (i.e. grounds for selection above):

Miraka Limited is a Maori-owned dairy processing company in the upper Waikato, with suppliers also in the upper Waikato. It is an intergenerational business committed to guardianship of the environment. As such, it has an interest in the proposal that is greater than the interest the general public has.

PLEASE INDICATE WHETHER YOU WISH TO SPEAK AT A HEARING

- Yes, I wish to speak at the hearing in support of my further submission.
- No, I do not wish to speak at the hearing in support of my further submission.

JOINT SUBMISSION

- If others make a similar submission, please tick this box if you would consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

- Yes, I have attached 239 extra sheets.
- No, I have not attached extra sheets.

SIGNATURE - NOTE A SIGNATURE IS NOT REQUIRED IF YOU MAKE YOUR SUBMISSION BY ELECTRONIC MEANS

Signed  Richard Wyeth Date 17.9.2018.
Type name if submitting electronically
Chief Executive Officer
Miraka Limited

FURTHER SUBMISSIONS CAN BE SENT BY



Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240



Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton



(07) 859 0998



healthyivers@waikatoregion.govt.nz *Please note: Submissions received by email must contain full contact details.*

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

Personal information is used for the administration of the submissions process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

Form 6 of Schedule 1, Resource Management Act 1991.

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1

NAME OF ORIGINAL SUBMITTER: _____ **ORIGINAL SUBMITTER ID:** _____

ADDRESS OF ORIGINAL SUBMITTER: _____

Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.

PROVISION (e.g. Objective 4 or Rule 3.11.5.1): _____ **SUBMISSION POINT ID** (e.g. PC1-1234 or V1PC1-1234) _____

Do you support or oppose the submission? Support Oppose

THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:
Tell us why you support or oppose this submission. These reasons will help us to understand your further submission

I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED): *Give precise details*

Large empty text area for providing reasons for support or opposition.

Large empty text area for stating whether the whole or part of the submission should be allowed or disallowed, with precise details.

21/30/2511

Add another page

NOTES ON MAKING A FURTHER SUBMISSION

1. Serving a copy of your further submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on (i.e. received by) Waikato Regional Council.

2. Further submission content review

Please note that your further submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

3. Privacy information

The Waikato Regional Council will make all submissions and further submissions including name and contact details publicly available on Council's website. Under the RMA, any further submission supporting or opposing an original submission is required to be served on the original submitter after it is served on council therefore your contact details must be made available.

Personal information will also be used for administration relating to the subject matter of the submissions, including notifying submitters of hearings and decisions. All information will be held by the Waikato Regional Council with submitters having the right to access and correct personal information.

Contact us for more information

Phone: 0800 800 401

Email: healthyrivers@waikatoregion.govt.nz

Ata Rangi 2015 Limited Partnership; ID 74045; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Ata Rangi 2015 Limited Partnership	ORIGINAL SUBMITTER ID: 74045
ADDRESS OF ORIGINAL SUBMITTER: PO Box 258, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 1	SUBMISSION POINT ID: PC1-1620
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Ata Rangi 2015 Limited Partnership	ORIGINAL SUBMITTER ID: 74045
ADDRESS OF ORIGINAL SUBMITTER: PO Box 258, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-6122
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p> <p>Miraka also sought an amendment to clause d., and continue to seek that. We maintain our position that the degree of reductions be proportionate to the difference between current practices and the application of Best Management Practices (those not currently applying mitigations expected to make greater reductions). The most efficient way of doing this would be to replace the nitrogen leaching approach with a nitrogen surplus approach. This would avoid both the geophysical bias effect and the main issues with Overseer inaccuracy, and would enable a focus on actual management practices, which can be changed in the short term.</p> <p>Our support of Ata Rangi's decision sought is in addition to our own.</p>	<p>Whole Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Ata Rangi 2015 Limited Partnership	ORIGINAL SUBMITTER ID: 74045
ADDRESS OF ORIGINAL SUBMITTER: PO Box 258, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 6	SUBMISSION POINT ID: PC1-6133
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p> <p>Miraka continues to support the Policy 6 restrictions on land use change that would result in an increase in diffuse discharges (with Policy 16 exceptions). We continue to support land use change that demonstrates decreases in diffuse discharges. We now also seek to enable land use changes within a property or enterprise that apply best management practice and cause no net increase in contaminant loss. Miraka supports the Ata Rangi submission on this issue.</p>	<p>Part;</p> <p>ADD a new policy:</p> <p><u>"Policy [X2] - Flexibility for land use change Land use change consent applications for activities that will not result in an increased diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens across a property or enterprise will generally be granted, taking into account:</u></p> <ul style="list-style-type: none"> i. <u>Implementation of best management practice actions for nitrogen, phosphorus, sediment and microbial pathogen for the proposed land use through the use of Farm Environment Plans for each property or enterprise; and</u> ii. <u>The creation of positive economic, social and cultural benefits for the Waikato Region."</u> <p>Allow</p>

Auckland/Waikato Fish & Game and Eastern Region Fish & Game; ID 74085; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Auckland/Waikato Fish and Game and Eastern Region Fish and Game	ORIGINAL SUBMITTER ID: 74085
ADDRESS OF ORIGINAL SUBMITTER: 156 Brymer Road, RD 9, Hamilton 3289	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Entire submission	SUBMISSION POINT ID: Entire submission
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
With the exception of specific Submission Points to which Miraka has provided a Further Submission below, we oppose the entire Fish and Game submission on PC1. We consider many of the submission points to be too general to ensure clear interpretation and we reserve our right to comment as the submitter reveals detail.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Auckland/Waikato Fish and Game and Eastern Region Fish and Game	ORIGINAL SUBMITTER ID: 74085
ADDRESS OF ORIGINAL SUBMITTER: 156 Brymer Road, RD 9, Hamilton 3289	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-11007
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
The determination of long-term nutrient allocation frameworks requires a full Schedule 1 process. It is pre-emptive to indicate a preferred framework or to provide a nutrient transfer or trading regime at this stage.	<p>Part; “AND AMEND to give effect to the following points: ... 20. That nutrient transfer or trading regimes are provided in order to enable leaching reductions to be achieved at least cost and with maximum flexibility of resource use (to enable economic benefits to be maximised from the available resource) in cases where the required outcome and targets for that catchment cannot be met with natural carrying capacity based allocation systems or where communities choose this system of allocation;” Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Auckland/Waikato Fish and Game and Eastern Region Fish and Game	ORIGINAL SUBMITTER ID: 74085
ADDRESS OF ORIGINAL SUBMITTER: 156 Brymer Road, RD 9, Hamilton 3289	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 1	SUBMISSION POINT ID: PC1-10806
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. We seek sub-catchment scale management for effective water quality management; targets and monitoring must be at the same scale.	Part; “AND AMEND to include appropriate sites for every sub-catchment. AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2”. Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Auckland/Waikato Fish and Game and Eastern Region Fish and Game	ORIGINAL SUBMITTER ID: 74085
ADDRESS OF ORIGINAL SUBMITTER: 156 Brymer Road, RD 9, Hamilton 3289	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 12	SUBMISSION POINT ID: PC1-10888
o you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Auckland/Waikato Fish and Game and Eastern Region Fish and Game	ORIGINAL SUBMITTER ID: 74085
ADDRESS OF ORIGINAL SUBMITTER: 156 Brymer Road, RD 9, Hamilton 3289	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 13	SUBMISSION POINT ID: PC1-10900
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Auckland/Waikato Fish and Game and Eastern Region Fish and Game	ORIGINAL SUBMITTER ID: 74085
ADDRESS OF ORIGINAL SUBMITTER: 156 Brymer Road, RD 9, Hamilton 3289	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.2	SUBMISSION POINT ID: PC1-10911
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports Certified Industry Schemes and consider them to be a practical, effective and efficient means to achieving consistency and implementation of Farm Environment Plans, provided the Council maintains its role of oversight and auditing.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Auckland/Waikato Fish and Game and Eastern Region Fish and Game	ORIGINAL SUBMITTER ID: 74085
ADDRESS OF ORIGINAL SUBMITTER: 156 Brymer Road, RD 9, Hamilton 3289	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.5	SUBMISSION POINT ID: PC1-10933
Do you support or oppose the submission? Oppose in part and Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>The determination of long-term nutrient allocation frameworks requires a full Schedule 1 process. It is pre-emptive to indicate a preferred framework at this point, or to provide a nutrient transfer or trading regime at this stage.</p> <p>Same reasons as those given by the submitter.</p>	<p>Part; “AMEND Method 3.11.4.5 to include provision for trading of contaminant loss rates between enterprises or properties in the same sub-catchment where the reductions required cannot be achieved whilst maintaining profitability on-farm.”</p> <p>Disallow</p> <p>Part; “AND AMEND to include the potential for collective consents to minimise the regulatory burden, as well as enable management to occur across multiple properties or landholdings.”</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Auckland/Waikato Fish and Game and Eastern Region Fish and Game	ORIGINAL SUBMITTER ID: 74085
ADDRESS OF ORIGINAL SUBMITTER: 156 Brymer Road, RD 9, Hamilton 3289	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.9	SUBMISSION POINT ID: PC1-10970
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Auckland/Waikato Fish and Game and Eastern Region Fish and Game	ORIGINAL SUBMITTER ID: 74085
ADDRESS OF ORIGINAL SUBMITTER: 156 Brymer Road, RD 9, Hamilton 3289	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Rule 3.11.5.3	SUBMISSION POINT ID: PC1-10998
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>We support Certified Industry Schemes and consider them to be a practical, effective and efficient means to achieving consistency and implementation of Farm Environment Plans, and therefore oppose the request to delete this provision.</p> <p>We are, however, open to discussion on the possibility of collective sub-catchment consents and other mechanisms to strengthen collective ties within sub-catchments.</p>	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Auckland/Waikato Fish and Game and Eastern Region Fish and Game	ORIGINAL SUBMITTER ID: 74085
ADDRESS OF ORIGINAL SUBMITTER: 156 Brymer Road, RD 9, Hamilton 3289	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Rule 3.11.5.4	SUBMISSION POINT ID: PC1-10999
Do you support or oppose the submission?	Oppose part and Support part
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>We support the use of Certified Industry Schemes</p> <p>Same reasons as those given by the submitter. We are opposed to the grandparenting regime created by the 75th percentile NRP, and to the inequities this would create in relation to biophysical differences within an FMU. We seek a focus on improving water quality through changing practice, with those furthest from good management practice having the greatest opportunity to improve.</p>	<p>Part; Removal of reference to a Certified Industry Scheme. Disallow</p> <p>Part; Removal of reference to: “properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;” and removal of Matters of Control iv: “iv. Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026.” Allow</p>

Beef + Lamb New Zealand Limited; ID 73369; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-13153
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-13154
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-13156
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports a strengthened sub catchment management approach, as this is the appropriate scale for identifying water quality objectives and issues, and for effective management. Sub catchment scale management facilitates information sharing and engagement, both of which are key to Practice Change and improving water quality.</p> <p>Miraka opposes the inclusion of a nitrogen allocation method. Firstly, we consider that the management of all contaminants should be on the same basis, i.e. specified Practice Change. Secondly, the introduction of any allocation framework should be subject to full First Schedule RMA process. Miraka strongly opposes any reference to future allocation frameworks and particularly the indication of a preferred framework, as this is pre-emptive.</p> <p>The first step is to determine whether allocation is necessary and if so, then the second step is to determine, in consultation, the principles for allocation. Only after that should potential allocation frameworks be suggested and evaluated.</p> <p>Miraka commends Beef+Lamb's efforts in outlining the principles, and reserve our position on the individual principles suggested. We wish to be involved in any discussions on allocation principles and alternative frameworks.</p>	<p>Part; "AMEND PPC1 and re-notify inclusive of an amended and strengthened sub-catchment approach. AND AMEND so that objectives, policies, methods and rules, are included which facilitate and support the establishment and operation of (sub) catchment collective groups to manage water quality and biodiversity issues facing a catchment. AND AMEND so that objectives, policies and methods support innovative and, where required, edge of field mitigation which facilitates flexible, viable businesses and encourages communities to work together to identify, understand and act collectively to improve water quality. AND AMEND so that regulatory methods are tailored to address the environmental issues specific to a sub-catchment or watershed and that land use.</p> <p>Allow</p> <p>Part; AND AMEND to include an alternative nitrogen management and allocation method, in accordance with the submission and with the following principles [see the 14 principles in the full submission] for the allocation of nutrients. AND AMEND so that N discharge/leaching standards/allocations are established based not on existing use and discharge profiles, but on the</p>

	<p>underlying natural capacity of soils and within the assimilative capacity of water.</p> <p>AND AMEND so that allocation methods achieve the limits and targets set by PPC1 and the Objectives of the plan.</p> <p>AND AMEND so that nitrogen loads are allocated within (sub)catchments in such a way that there is an equitable allocation of total catchment nitrogen load to all users/activities who may wish to use the available resource.</p> <p>AND AMEND to establish a nutrient transfer regime for nutrient user groups within sub-catchments, where catchment loads and limits have been established but only where any allocation methods are not based on current discharges (NRP) or land use. Transfer regimes are to enable nitrogen loss reductions to be achieved at least cost and to enable and encourage maximum efficiency and flexibility of resource use and to optimise economic benefits. Nutrient transfer systems must meet the following conditions:</p> <ul style="list-style-type: none">• The initial allocation system meets all of the allocation principles;• Only occurs within a sub-catchment or watershed and only within a nutrient user/Catchment Collective Groups;• The transferable portion of the resource (e.g. nitrogen) only pertains to the load which achieves the desired environmental outcomes; and• Result in improved economic outcomes and land use optimisation.” <p><i>Disallow</i></p>
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-13158
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka opposes a sector-specific approach to the provisions, such as recognising and providing for dry stock sector farming operations specifically. Provisions should be relative to discharges and their effects on the environment.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Full achievement of the Vision and Strategy will be intergenerational	SUBMISSION POINT ID: PC1-11146
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka strongly supports a sub catchment management approach, as per the reasons given in our original submission. A sub catchment scale approach to the identification of issues, setting of objectives and subsequent determination of appropriate mitigation options, implementation and monitoring will facilitate education, engagement and Practice Change, all of which are fundamental drivers of improvements in water quality.	Part; Amendments which refer to the reasons for time lags in implementing change, and amendments which bring focus to sub catchment management, including: "AND AMEND bullet points on page 15 by adding a new bullet point, as follows: " <u>taking a targeted and risked based approach to managing land and water resources which is focused on sub-catchments and which ensures that:</u> <u>(i) water quality is managed to ensure that:</u>

We also support a targeted and risk-based approach, and the inclusion of both diffuse and point source discharges.

Miraka opposes any reference to 'require significant reductions in discharges from some land uses' in the provisions, as provisions should be relative to discharges and their effects on the environment (i.e. intensity of land use rather than land use per se). The targeting of particular land uses is potentially divisive for the community, counter-productive to effective sub catchment management and may not focus on where the change is needed. For example, dairying may be seen as a land use that requires reduction, but an intensive bull beef operation (classified as dry stock) may actually have a higher nitrogen surplus or cause greater sedimentation and P loss. Further, we consider all activities should potentially reduce their discharges in line with the application of good management practice.

(a) water quality is maintained in those rivers and lakes where the existing water quality is at a level sufficient to support the Values in Section 3.11.1 Objective 1A

(b) water quality is enhanced in those rivers and lakes where the existing water quality is not at a level sufficient to support the Values in Section 3.11.1 Objective 1A, so that the values are supported by 2097;

(c) accelerated eutrophication and sedimentation of lakes in the catchment is prevented or minimised"

AND DELETE bullet point three in relation to the Nitrogen Reference Point and holding land uses to this historic discharge rate.

AND AMEND bullet point five, to give effect to the intent as follows:

"Waikato Regional Council to incentivise, enable, and support sub-catchment approaches to sustainable land and water management, and adoption of edge of field mitigation where required. Regulatory, non-regulatory, and financial instruments are provided to enable and support communities working together in their watershed (sub-catchments) to address develop approaches outside the Rule framework that both point source and diffuse losses of contaminants to water, allow contaminant loss risk factors to be assessed at a sub-catchment level, and implement mitigations that look beyond individual farm property boundaries to identify the most cost-effective and influential solutions."

AND AMEND Section 3.11 to reflect the outcomes sought in this submission.

Allow

Part;

Amendments which refer to requiring reductions in discharges from **some** land uses.

Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.2	SUBMISSION POINT ID: PC1-11150
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the consideration of amended or new Objectives which include focus on the values of freshwater, provide tabled Freshwater Objectives, recognise and provide for collaborative sub-catchment groups in sustainably managing water quality, and provide for wellbeing of people and communities for the same reasons as those given by the submitter. We reserve our position on the specific wording.</p> <p>Miraka opposes the introduction of Objectives which focus on nitrogen and nitrogen allocation frameworks, or recommend a particular basis for an allocation framework, such as natural capital or Land Use Capability. We consider that the management of all contaminants should be on the same basis, i.e. specified Practice Change. Further, the introduction of any allocation framework should be subject to full First Schedule RMA process. Miraka strongly opposes any reference to future allocation frameworks and particularly the indication of a preferred framework, as this is pre-emptive.</p> <p>The first step is to determine whether allocation is necessary and if so, then the second step is to determine, in consultation, the principles for allocation. Only after that should potential allocation frameworks be suggested and evaluated. We wish to be involved in any discussions on allocation principles and alternative frameworks.</p>	<p>Part;</p> <p>“AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which establish Freshwater Objectives based on the values of freshwater including cultural, recreational, and ecological values, along with consumptive values (ability to assimilate pollution, food production, and forestry).</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which change Table 3.11-1 numerical water quality targets to Freshwater Objectives as appropriate (i.e. chlorophyll a, clarity, E.coli), and remove these parameters from Table 3.11-1 and instead hold as numerical freshwater Objectives.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required new Objectives which recognise and provide for the establishment and operation of collaborative sub-catchment groups, both through regulatory and non-regulatory methods, in sustainably managing water quality and biodiversity issues facing a catchment, providing innovative and where required edge of field mitigation and which facilitates flexible, viable businesses and communities, and enables sustainable management of resources such as nutrients within the assimilative capacity of soils and water, to achieve the Vision and Strategy for the Waikato River.</p> <p>...</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which provide for the economic and social wellbeing of people and communities, people and community resilience, adaptive management, and sub-catchment approaches lead by communities.</p>

	<p>...</p> <p>AND AMEND PPC1 so that it adopts and truly encourages and empowers a sub-catchment approach to managing land use and water quality, tailored to the specific issues faced by the sub-catchment, and with appropriate time frames for achievement of its interim targets and long-term Objectives.</p> <p>...</p> <p>AND AMEND Table 3.11-1 and PPC1 Objectives to make a clear distinction between what are Freshwater Objectives, Attributes, limits and targets. Freshwater Objectives would include values of freshwater such as cultural, ecological, primary production, commercial, and recreational and may include numerical parameters for periphyton, chlorophyll a, macroinvertebrate community indices (MCI) and sediment and clarity.</p> <p>Allow</p> <p>Part;</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure resource use is efficient including through establishment of nitrogen allocation frameworks if nitrogen is required to be allocated. AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure that resource use takes into account the natural capital of soils including the natural productive potential of soils (for example Land Use Capability), climate, geology, and assimilative capacity of water.”</p> <p>Disallow</p>
--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 1	SUBMISSION POINT ID: PC1-11154
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. We reserve our position on the specific wording.	Part - concept Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 3	SUBMISSION POINT ID: PC1-11482
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. We reserve our position on the specific wording.	Part - concept Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.3	SUBMISSION POINT ID: PC1-11484
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. We reserve our position on the specific wording.	Part - concept Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 1	SUBMISSION POINT ID: PC1-11485
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka opposes Beef+Lamb's extreme focus on nitrogen. All contaminants are of potential concern, and all contaminant discharges must be managed, as identified at the sub catchment level. Miraka also opposes the introduction of a nitrogen allocation frameworks, and the suggested methods for such allocation. The introduction of any allocation framework should be subject to full First Schedule RMA process. Miraka strongly opposes any reference to future allocation frameworks and particularly the indication of a preferred framework, as this is pre-emptive. The first step is to determine whether allocation is necessary and if so, then the second step is to determine, in consultation, the principles for allocation. Only after that should potential allocation frameworks be	Whole Disallow

<p>suggested and evaluated. We wish to be involved in any discussions on allocation principles and alternative frameworks.</p> <p>Miraka also opposes Beef+Lamb’s principle that “those activities and land uses which are contributing the most to the over allocated parameter bear the majority of the cost” and consider a more equitable principle to be “those activities that are furthest from the application of good management practices are expected to make the greatest practice change and greater reductions”, for reasons given in our original submission. The most efficient way of doing this would be to replace the nitrogen leaching approach with a nitrogen surplus approach. This would avoid both the geophysical bias effect and the main issues with Overseer inaccuracy, and would enable a focus on actual management practices, which can be changed in the short term.</p>	
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 1	SUBMISSION POINT ID: PC1-12575
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports amendments to strengthen the sub catchment management approach, for the same reasons as those given by the submitter and in our original submission.</p> <p>We also support the suggested amendments regarding water quality targets, for the same reasons as those given by the submitter. We reserve our position on the specific wording.</p>	<p>Part;</p> <p>“AMEND Policy 1 so that management approaches are tailored to addressing water quality issues identified on a sub-catchment basis, and where the responsibility of addressing the impacts is apportioned to those land uses including point and non-point source discharges which have caused or contributed to any over allocation, and where improvements required over time are appropriate to the level of impact.</p> <p>AND AMEND Policy 1 AND/OR include a new Policy to enable establishment and operation of sub-catchment groups working through global consents to sustainably manage land and water resources, to be</p>

Miraka opposes nutrient transfer as this is part of an allocation framework.

innovative, to share and move resources as required within environmental limits, to be flexible, to recognise and provide for biodiversity values, to adopt edge of field mitigation and to offset residual impacts.

...

AND ADD new Policy 1A OR AMEND Policy 1 to give effect to Objective 1A and 1B with the intent of:

“Where current water quality meets the relevant Table 3.11 - 1 water quality outcomes (interim targets or 80 year targets/limits) within each sub-catchment, water quality must be managed in a manner which ensures that the water quality targets/ limits continue to be met beyond the zone of reasonable mixing.

Where Table 3.11-1 water quality targets/limits are not met, water quality within the sub-catchment must be managed in a manner which progressively improves existing water quality relevant to the parameter exceeded, in order to meet:

- (i) The water quality target/limit for the sub-catchment by 2096, and/or
- (ii) (ii) The relevant value that the water quality target/limit is designed to safeguard”

Allow

Part;

AND AMEND PPC1 and Policy 1 to enable establishment of nutrient user groups within the same catchment as part of catchment collective groups AND enable transfer of nutrients (at a level not exceeding the desired in-stream nutrient load), where principles in Appendix A of the submission are met, precluding nutrient transfer when allocation is based on current or historic discharges AND transfer within nutrient user groups only occurs: within a sub-catchment or watershed; within an established sub-catchment programme that's based on fair allocation of a load; only pertains to the load which achieves the desired environmental outcome; results in improved economic outcomes and land use optimization.”

Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-11487
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-12709
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given on Submission Point PC1-11485	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 5	SUBMISSION POINT ID: PC1-11489
Do you support or oppose the submission? Oppose in part and Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given on Submission Point PC1-11146.	<p>Part; sub-catchment approaches Allow</p> <p>Part; 'require significant reductions in discharges from some land uses' Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 6	SUBMISSION POINT ID: PC1-11490
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter, to some extent. Miraka is willing to consider some flexibility for land use change where sub catchment outcomes for water quality are able to be met. We reserve our position on the extent of this and the specific wording.	<p>Part Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: PC1-11491
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes the introduction of an allocation framework, and the suggested methods for such allocation.</p> <p>The introduction of any allocation framework should be subject to full First Schedule RMA process. Miraka strongly opposes any reference to future allocation frameworks and particularly the indication of a preferred framework, as this is pre-emptive. The first step is to determine whether allocation is necessary and if so, then the second step is to determine, in consultation, the principles for allocation. Only after that should potential allocation frameworks be suggested and evaluated. We wish to be involved in any discussions on allocation principles and alternative frameworks.</p> <p>Further, we oppose Beef+Lamb's support of a land suitability approach. Controls based on current perceptions of land use suitability are in effect, input controls, not necessarily based on outcomes.</p>	<p><i>Whole</i></p> <p><i>Disallow</i></p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 8	SUBMISSION POINT ID: PC1-11492
Do you support or oppose the submission? Oppose in part and Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes the 75th percentile approach as inequitable, as per our explanation in our original submission. Miraka considers a more equitable principle to be “those activities that are furthest from the application of good management practices are expected to make the greatest practice change and greater reductions”. The use of a farm N Surplus approach would support this principle.</p> <p>We support sub catchment management approaches, including the establishment of catchment collaborative groups as this will facilitate Practice Change, which is the basis for improvements in water quality.</p>	<p>Part; “AMEND Policy 8 to require reductions of Nitrogen greater than the currently proposed 75th percentile.”</p> <p>Disallow</p> <p>Part; establishment of catchment collaborative groups</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 9	SUBMISSION POINT ID: PC1-11493
Do you support or oppose the submission? Support in part and oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the strengthening of sub catchment management approaches as an important component of Practice Change, which is the basis for improvements in water quality.</p> <p>We oppose nutrient transfer as this is part of an allocation framework.</p>	<p>Part; “RETAIN Policy 9 AND AMEND to facilitate and support the establishment and operation of sub-catchment groups to manage water quality and biodiversity issues</p>

	<p>facing a sub-catchment, providing innovative and, where required, edge of field mitigation, and which facilitates flexible, viable businesses and communities.</p> <p>AND AMEND to give effect to new collaborative catchment objectives.”</p> <p>Part; “...and enables transfer of resources such as nutrients...”</p> <p>Disallow</p>
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4	SUBMISSION POINT ID: PC1-11494
o you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the strengthening of sub catchment management approaches as an important component of Practice Change, which is the basis for improvements in water quality.</p> <p>We reserve our position on the specific wording.</p>	<p>Part; Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.5	SUBMISSION POINT ID: PC1-11497
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the strengthening of sub catchment management approaches as an important component of Practice Change, which is the basis for improvements in water quality.</p> <p>We oppose nutrient user groups and transfers as this is part of an allocation framework.</p>	<p>Part; “AMEND Method 3.11.4.5 to provide for managing contaminant loads at a sub-catchment level AND much more targeted and prioritised use of Farm Environment Plans to suit sub-catchment priorities. AND AMEND to provide for sub-catchment collectives or nutrient user groups to encourage and empower catchment communities working together to improve water quality.” Allow (except for part blocked in grey)</p> <p>Part; or nutrient user groups Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.7; 3.11.4.8; 3.11.5; 3.11.5.2	SUBMISSION POINT ID: PC1-11498, PC1-11499, PC1-11500, PC1-11502
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
In so far as this relates to nutrient allocation Miraka opposes it, for the reasons given against Submission Points PC1-13156, PC1-11150, PC1-11485 and PC1-11491.	Part; Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.4	SUBMISSION POINT ID: PC1-11503
Do you support or oppose the submission? Oppose in part and Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes the 75th percentile approach for reasons given in our original submission, and opposes an amendment to a 50th percentile for the same reasons.</p> <p>Miraka supports the Beef+Lamb qualification that reductions (of any contaminant) need only be required if the property or enterprise is within a catchment where the specific contaminant has been identified as requiring reduction. Reductions of some contaminant discharges may not always be required.</p>	<p>Part: AMEND Rule 3.11.5.4 (1) as follows: “...and properties or enterprises with a Nitrogen Reference Point greater than the 75th <u>50th</u> percentile</p> <p>Disallow</p> <p>Part: <u>that are also within a sub-catchment which is currently over allocated in relation to Nitrogen (Table 3.11- 1 and 3.11-2);</u> ...</p>

Miraka supports the deletion of reference to the 75th percentile in Rule 3.11.5.4 (iv), and the replacement clause, but reserve our position on the specific wording, and seek that the same approach apply to all contaminants.

Miraka opposes the references to land use capability or suitability, for the same reasons as given against Submission Points PC1-13156, PC1-11150, PC1-11485 and PC1-11491.

Miraka supports the tailoring of environmental mitigation to critical source identification and management, for the same reasons as those given by the submitter.

AND ADD under 'matters of control (ii) reference to the sub-catchment water quality outcomes and sub-catchment specific issues. Reductions of contaminant discharges may not always be required;

Allow

Part:

AND DELETE reference to the 75th percentile in Rule 3.11.5.4 (iv) AND REPLACE with “for catchments which are currently over allocated for Nitrogen, actions, timeframes, and other measures to ensure the diffuse discharge of Nitrogen is reduced over the term of consent proportionate to the level of over allocation and the contribution that activity makes to the over allocation.”

Allow

Part:

AND ADD reference to Nitrogen discharge limit(s) (based on an estimate or band for land use capability or suitability), as set out under Policy 1 AND require consideration of Nitrogen discharge reductions through the consent where sub-catchment discharge thresholds are exceeded. AND AMEND to enable land uses to discharge to a series of Nitrogen discharge thresholds based on a sub-catchment assessment of Land use capability, or suitability.

Disallow

Part

AND AMEND to tailor environmental mitigation to critical source identification and management.”

Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.6	SUBMISSION POINT ID: PC1-11504
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the strengthening of focus on sub catchment management as an important component of Practice Change, which is the basis for improvements in water quality.</p> <p>We reserve our position on the remainder of the requested amendments.</p>	<p>Part; “AMEND Rule 3.11.5.6 to enable and facilitate sub-catchment collective groups and enterprises in sustainably managing land and water resources to achieve the water quality attributes and targets in Table 3.11-1 by 2096. AND AMEND as follows: "Waikato Regional Council restricts its discretion over the following matters: i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers in the relevant sub-- catchment(s).” Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.7	SUBMISSION POINT ID: PC1-11505
Do you support or oppose the submission? Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>In so far as this relates to nutrient allocation Miraka opposes it, for the reasons given against Submission Points PC1-13156, PC1-11150, PC1-11485 and PC1-11491.</p>	<p>Part: Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule C – Stock exclusion	SUBMISSION POINT ID: PC1-11507
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 1	SUBMISSION POINT ID: PC1-12365
Do you support or oppose the submission? Oppose in part and Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
In so far as this relates to nitrogen percentile approach, Miraka opposes it for the reasons given in our original submission.	Part: percentile approach Disallow
In so far as this provides a proportionality approach over time, which could be based on changes toward full application of good management practices, Miraka is willing to consider it. Our position is that ALL farming activities be required to apply Good Management Practices, and that Best Management Practices be included in Farm Environment Plans as appropriate to the sub-catchment issue(s) and severity. We reserve our position on the specific wording.	Part: proportionality approach over time Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 1	SUBMISSION POINT ID: PC1-11508
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	<p>Part; “AMEND Schedule 1 so farmers can identify the specific actions they will need to take through their Farm Environment Plan to address any water quality issues relevant within their sub-catchment. The Council must identify relevant water quality issues within the sub-catchment, as well as the associated mitigations that farmers should consider. This information must be provided to farmers before they are required to develop a Farm Environment Plan.”</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11-1	SUBMISSION POINT ID: PC1-11158
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka reserves its position on the specific wording	<p>Part Allow</p>

Dairy Goat Co-Operative (NZ) Ltd; ID 74044; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy Goat Co-Operative (NZ) Ltd	ORIGINAL SUBMITTER ID: 74044
ADDRESS OF ORIGINAL SUBMITTER: PO Box 1398, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-4129
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter: “Dairy Goat Co-operative submits that historic pro-active environmentally sound actions by land managers should be recognised and rewarded, and certainly not disadvantage those that have taken early action in any way. Farming families supplying the Dairy Goat Co-operative have opted to use a specific type of farming system, and have undertaken riparian fencing and planting on their farms. They have invested significantly in effluent systems, solids storage, and management systems that leave them with reduced options for future contaminant loss mitigation. They have acted early. There are likely to be other land managers who have not yet recognised or taken action to address the range of contaminants they currently lose to the Waikato catchment, especially contaminants other than nitrogen. This lack of action to date provides these land managers with a greater range of mitigations they can implement in the future.”</p> <p>The same type of responsible pro-active mitigation investment has been undertaken by farming families supplying Miraka Limited, under Te Ara Miraka.</p> <p>“Dairy Goat Co-operative submits that the Proposed Plan Change must ensure that the impacts of change are equitably shared, with recognition of historic activities taken by land managers to reduce contaminant loss, and</p>	<p>Whole Allow</p>

<p>the reduction in mitigation options that have already resulted. To do otherwise would be both unfair and send perverse incentives to land managers. This would then likely result in a lack of early uptake of best practice in the future unless required using regulation. Dairy Goat Co-operative also submits that in any consideration of future allocation of contaminant discharge rights, that this issue (recognition of past positive actions) and the need for fairness and equity should be key guiding principles.”</p>	
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

Dairy NZ; ID 74050; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Full achievement of the Vision and Strategy will be intergenerational	SUBMISSION POINT ID: PC1-10164
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 3	SUBMISSION POINT ID: PC1-10168
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Reasons for adopting Objective 3	SUBMISSION POINT ID: PC1-10189
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 1	SUBMISSION POINT ID: PC1-12592
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Diffuse and point source discharges both need to be managed. Miraka supports a tailored risk-based approach to management of farm activities, including the application of industry-agreed good management practice. Miraka's position is that ALL farming activities be required to apply Good Management Practices, and that Best Management Practices be included in Farm Environment Plans as appropriate to the sub-catchment issue(s) and severity. This approach facilitates community and on-farm engagement, which are the keys to practice change. Practice change is the driver for water quality improvement.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 1	SUBMISSION POINT ID: PC1-10196
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter for part.</p> <p>Miraka seeks to replace the term 'nitrogen leaching' with 'nitrogen surplus'. This approach focuses on those aspects that are within the direct control of the land user and can be mitigated, and removes the confounding factors of rainfall, drainage and soil type, which the land user has no control over. It also avoids some of the issues currently recognised with the use of Overseer as a leaching model.</p>	<p>Part; Policy 1: Manage diffuse <u>and point source</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens/Te reo translation Manage and require reductions in sub-catchment-wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by: "a. Enabling activities with a low level <u>or a managed low risk</u> of contaminant discharge to water bodies provided those discharges do not increase; and b. Requiring farming activities <u>to be managed through a tailored, risk-based approach, including;</u> i. <u>each farm and enterprise demonstrating achievement of industry-agreed good management practice, and;"</u> Allow</p> <p>Part; ii. <u>pastoral farms with moderate to high levels of nitrogen leaching over a specified amount</u> contaminant discharge to water bodies, or for to reduce their <u>nitrogen</u> discharges; and" Disallow in part: replace the term 'nitrogen leaching' with 'nitrogen surplus'</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-12741
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter for part.</p> <p>Miraka believes that all four contaminants be managed in a similar manner for the first stage, with a tailored risk approached approach to define mitigation actions on the land.</p> <p>Miraka opposes the 75th percentile approach, for reasons given in our original submission.</p>	<p>Part; RETAIN the first sentence of Policy 2 and clause (b) and (c). AND AMEND Policy 2 (a) to read: "a. Taking a tailored, risk-based approach to define mitigation actions on the land that will reduce <u>for</u> diffuse discharges of nitrogen..." AND ADD a NEW clause (e) to read: <u>"Where sub-catchment plans do not exist, individual Farm Environment Plans shall ensure that that the risk of diffuse phosphorus, nitrogen, sediment, and microbial pathogens entering waterbodies is identified by suitably qualified and experienced people, and time-bound and monitored actions are put in place to address risks of phosphorus, sediment and microbial contaminants.</u></p> <p>Allow</p> <p>Part; <u>For diffuse nitrogen discharges, Farm Environment Plans will:</u></p> <ul style="list-style-type: none"> i. <u>ensure that nitrogen losses stay within a five-year rolling average, and</u> ii. <u>for farms above the 75th percentile value, nitrogen losses decrease to that value, and</u> iii. <u>for all other farms, nitrogen losses do not exceed the Nitrogen Reference Point."</u> <p>Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-10198
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p> <p>Miraka also sought an amendment to Policy 2, and continues to seek that. Our support of DairyNZ's decision sought is in addition to our own. Miraka opposes clause (d) where the degree of reduction in diffuse discharges be proportionate to the amount of current discharge, and instead suggests that the degree of reduction be proportionate to the gap on farm between current practices and good management practices for reducing contaminant discharge.</p>	<p>Part;</p> <p>AMEND Policy 2 (d) to read:</p> <p>"d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount <u>risk</u> of current discharge <u>leaving a property from overland flow or leaching below the root zone, as identified in farm environment plans entering waterbodies</u></p> <p>Allow</p> <p>Part;</p> <p>(those discharging more are expected to make greater reductions) and proportionate to the scale of water quality improvement required in the sub-catchment <u>plan</u>; and..."</p> <p>Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: PC1-10229
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter, and in our original submission.</p> <p>In addition, Miraka supports the wording DairyNZ seeks “research will be undertaken in partnership with technical and industry organisations, in a manner that allows people and communities to understand the social, environmental, cultural and economic implications of the current plan, and engage in debate about any future limits” as such a level of engagement is a pre-requisite to effective and enduring Practice Change.</p> <p>Miraka strongly supports the removal of any reference to future allocation frameworks and particularly the indication of a preferred framework, as this is pre-emptive.</p>	<p><i>Whole, including the deletion of ‘land suitability’ and text on future allocation</i></p> <p><i>Allow</i></p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 9	SUBMISSION POINT ID: PC1-10237
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter. Miraka also sought an amendment to Policy 9, and continues to seek that. Our support of DairyNZ's decision sought is in addition to our own. Policy 9 explicitly refers to early engagement with tangata whenua, landowners and communities, as a step toward identification of issues and subsequent mitigations. Miraka strongly supports sub catchment level engagement as a fundamental requisite of effective and enduring Practice Change, which is the key to water quality improvement</p>	<p>Whole Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4	SUBMISSION POINT ID: PC1-10239
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p>	<p>Whole Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.7	SUBMISSION POINT ID: PC1-10240
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter. Miraka also sought an amendment to 3.11.4.7, and continues to seek that. Our part support of DairyNZ's decision sought is in addition to our own.</p> <p>Miraka opposes the specific wording relating to property-level limits and its associated restriction of approaches and methods to that scale. We consider that taking an enterprise approach is fundamental to an integrated approach to sustainable management and improving water quality, and in particular to incentivising mitigations such as riparian planting or retirement of vulnerable land areas. Restriction to property-level limits would undermine this.</p>	<p>Part: principle of changes sought, including: <u>"Waikato Regional Council will take a broad-based and integrated approach to assessing existing information and new information gathered through PPC1. It will do this in partnership with other agencies and industries</u> ... <u>iv. Spatial variability in how land use and mitigations, and the effect of impounded water in hydro-dams affect water quality at a variety of scales, to analyse where mitigations can be put in place for the least cost to the regional community."</u></p> <p>Allow</p> <p>Part: "3.11.4.7 Information requirements to determine the need for <u>property-level limits on diffuse discharges and any future allocation...</u> <u>"...commissioning research on the effects of property-level limits on waterbodies,..."</u></p> <p>Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.8	SUBMISSION POINT ID: PC1-10241
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.10	SUBMISSION POINT ID: PC1-10242
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.11	SUBMISSION POINT ID: PC1-10243
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.12	SUBMISSION POINT ID: PC1-10244
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter with regard to the need to provide guidance for plan users and the importance of working with primary industry. We acknowledge that research and dissemination of knowledge into guidelines is an important component of Practice Change, which is the key to water quality improvement.</p> <p>Miraka supports the requirement for all activities to apply good management practice, which needs to be specified. It further seeks that Best Management Practices are identified within guidelines as a basis for the selection of relevant and appropriate mitigation actions within Farm Environment Plans. Therefore, rather than removing the text 'Best Management Practice' we seek clarity on the two terms, definitions for each, and guidelines for each.</p>	<p>Part; "b. <u>Work with primary industry and</u> support research into methods for reducing diffuse discharges of contaminants to water." Allow</p> <p>Part: "3.11.4.12: Support research and dissemination of best practice guidelines to reduce diffuse discharges/... Waikato Regional Council will: a) Develop and disseminate best management practice guidelines for reducing the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens; and..." Disallow or replace with ...a) Develop and disseminate good management and best management practice guidelines..."</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 1	SUBMISSION POINT ID: PC1-12391
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 1	SUBMISSION POINT ID: PC1-10255
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Dairy NZ	ORIGINAL SUBMITTER ID: 74050
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11-1	SUBMISSION POINT ID: PC1-10188
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Part; Clarification of what Table 3.11-1 currently lists (i.e. existing water quality monitoring sites) without future monitoring sites to those currently listed Allow

Department of Conservation; ID 71759; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Entire submission	SUBMISSION POINT ID: Entire submission
Do you support or oppose the submission? <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
With the exception of specific Submission Points to which Miraka has provided a Further Submission below, we oppose the entire Department of Conservation submission on PC1. We consider many of the submission points to be too general to ensure clear interpretation and we reserve our right to comment as the submitter reveals detail.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-8090
Do you support or oppose the submission? <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
The determination of allocation regimes should be subject to a full Schedule 1 process. The focus of PPC1 is on short-term practice changes and water quality improvements, and it would be inequitable to impose long term frameworks now without full process.	Part; "AND AMEND PPC1 to implement greater changes to the management of contaminant discharges in the short-term, through an allocation regime that recognises land type and achieves a greater short-term improvement in water quality.

	<p>AND, with respect to all Freshwater Management Units AMEND PPC1 to provide for an allocation regime that only permits the discharge of contaminants up to a level that ensures the limits and objectives for the freshwater management unit can be achieved. Where this level of contaminants has already been exceeded, the targets needs to be set with clear implementation methods to achieve them. The regime needs to take account the slope, soil type, drainage and geology of the land.</p> <p>AND AMEND PPC1 to establish an efficient allocation regime as follows:</p> <ul style="list-style-type: none">• State the maximum catchment load of contaminants.• Allocate the maximum catchment load among land uses using a Land Use Capability (LUC) based approach whereby land type including slope, soil type, drainage and geology is the key determinant.• Seek to ensure that activities which would cause the maximum catchment load to be exceeded are avoided.• Seek to ensure that in catchments that are already over-allocated, PPC1 establishes methods to phase out over-allocation over time.” <p><i>Disallow</i></p>
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.1	SUBMISSION POINT ID: PC1-8131, 8136, 8139, 8152, 8532, 8533, 8535, 8540
Do you support or oppose the submission?	Support in part
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka agrees that specific values should be determined for each management unit. However, we seek that the scale of management be at a sub-catchment level. The identification of specific values and issues will provide guidance on the objectives and subsequent range of mitigation actions for that sub-catchment. Miraka reserves its position on the specific wording amendments to the values	Part Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.2	SUBMISSION POINT ID: PC1-10521
Do you support or oppose the submission?	Support in part and Oppose in part
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka agrees that objectives should be identified that recognise and provide for the values for each management unit. However, we oppose the current definition and scale of Freshwater Management Units and seek that the scale of management be at a sub-catchment level. The identification of specific objectives will help guide the subsequent range of mitigation actions for that sub-catchment.	<p>Part; “AMEND PPC1 to clearly identify freshwater objectives that recognise and provide for intrinsic values for each Freshwater Management Unit.”</p> <p>Allow</p> <p>Part: Freshwater Management Units, as currently defined Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 3	SUBMISSION POINT ID: PC1-10540
Do you support or oppose the submission?	Support in part
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	<p>Part; “AND AMEND PPC1 to include the management of discharges of contaminants from point sources.”</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 4	SUBMISSION POINT ID: PC1-10542
Do you support or oppose the submission?	Oppose in part
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka strongly imposes the introduction of an allocation regime in the current Plan, for reasons given in its original submission.	<p>Part; “AND AMEND the objective to remove uncertainty around 'further contaminant reductions' by implementing an allocation regime for contaminants based on current information and knowledge with the ability to amend this regime further information becomes available. ... AND AMEND PPC1 to implement greater changes to the management of contaminant discharges in the short-term, through an allocation regime that recognises land type and achieves a greater short-term improvement in water quality.”</p> <p>Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 1	SUBMISSION POINT ID: PC1-10643
Do you support or oppose the submission?	Oppose in part and support in part
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes removal of the term 'manage' as without it there is a presumption that all contaminants in all sub catchments require reduction.</p> <p>We support clarity of definitions.</p>	<p>Part; "AMEND Policy 1 to replace "manage and require reductions" with "reduce." Disallow</p> <p>Part AND AMEND to provide clear definition of the terms low, moderate and high levels of contaminant discharge or replace these terms with other clearly defined terms." Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2; Policy 3	SUBMISSION POINT ID: PC1-10646, 10653
Do you support or oppose the submission?	Oppose
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes removal of the term 'manage' as without it there is a presumption that all contaminants in all sub catchments require reduction.</p>	<p>Whole Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 5	SUBMISSION POINT ID: PC1-10661
Do you support or oppose the submission?	Oppose
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka strongly opposes the introduction of a land-based allocation regime in the current Plan, for reasons given in its original submission.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 6; 3.11.5.7	SUBMISSION POINT ID: PC1-10664, 11059
Do you support or oppose the submission?	Support in part and Oppose in part
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports providing greater direction to decision makers, including to ensure that the Policy 16 exceptions are supported and further impediments are not imposed. Miraka opposes the suggestion of replacing Rule 3.11.5.7 with a Prohibited Activity rule as this would undermine Objective 5 and Policy 16. Rather, we suggest its replacement with a more certain consent pathway for tangata whenua ancestral land.	Part – providing greater direction to decision makers Allow Part; “ALTERNATIVELY, CONSIDER introducing a Prohibited Activity rule in place of 3.11.5.7 to avoid adverse effects of land use change on water quality.” Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: PC1-10667
Do you support or oppose the submission?	Oppose, with support for part
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>The determination of allocation regimes should be subject to a full Schedule 1 process. The focus of PPC1 is on short-term actions and improvements, and it would be inequitable to impose long term frameworks now without full process. Allocation principles should be determined first, including those of equity and effectiveness.</p> <p>Miraka supports flexibility for development of ancestral land, and supports the need to obtain clarity to ensure there are pathways to enable this.</p>	<p>Part: all minus the exception below Disallow</p> <p>With the exception of the part that seeks certainty for flexibility of development of tangata whenua ancestral land: “AND AMEND clause (b) to clarify what is meant by flexibility of development of tangata whenua ancestral land and how this part of the policy will be achieved.” Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 10	SUBMISSION POINT ID: PC1-10676
Do you support or oppose the submission?	Support in part and oppose in part
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p> <p>Miraka strongly opposes the introduction of a land-based allocation regime in the current Plan, for reasons given in its original submission.</p>	<p>Part; “AMEND Policy 10 to ensure that point source discharges are undertaken in a manner that recognises and provides for the values of individual water bodies. ... OR AMEND to ensure that the achievement of water quality goals is considered when processing consent applications for point source discharges. Allow</p> <p>Part; AND AMEND PPC1 so that point source discharges are considered as part of a land-based allocation regime.” Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 11	SUBMISSION POINT ID: PC1-10694
Do you support or oppose the submission?	Support
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 12	SUBMISSION POINT ID: PC1-10738
Do you support or oppose the submission?	Support in part and oppose in part
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Part Allow
Miraka strongly opposes the introduction of an allocation regime in the current Plan, for reasons given in its original submission.	Part; Request for allocation regime Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 16	SUBMISSION POINT ID: PC1-10745
Do you support or oppose the submission?	Support in part and Oppose in part
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the retention of Policy 16 (subject to clarification of consent pathways to achieve it). The intent of Objective 5 and Policy 16 is to enable the development of tangata whenua ancestral lands and minimise new impediments. Miraka therefore seeks a Controlled or Restricted Discretionary consenting pathway for change to land use on tangata whenua ancestral land, with discretion over the use of appropriate practices and mitigations and overall discharges. We also continue to seek amendments to Policy 16 as per our original submission to ensure that additional impediments are not inadvertently imposed through the specific wording.</p> <p>Miraka opposes the imposition of a land-based allocation regime on to tangata whenua ancestral land, as this potentially imposes further barriers and disadvantage and is contrary to Objective 5.</p>	<p>Part; "RETAIN Policy 16 Allow</p> <p>Part; AND AMEND Policy 16 and PPC1 to include a land-based allocation regime." Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4	SUBMISSION POINT ID: PC1-10633
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
As per our further submission to PC1-10667 above.	Part; That part related to and in consequence of the submission point on Policy 7 PC1-10667 . Disallow and allow as per our further submission to PC1-10667 above.

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.7	SUBMISSION POINT ID: PC1-10764
Do you support or oppose the submission?	Oppose
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes the immediate introduction of a land-based allocation regime. The determination of allocation regimes should be subject to a full Schedule 1 process.</p> <p>Miraka considers there has been insufficient consideration, process or consultation on potential allocation frameworks to include any form of one in PC1. It has not even been determined whether an allocation regime is required, or whether sufficient improvements in water quality can be achieved through the introduction of good management practice for all in conjunction with Best Management Practices incorporated into FEPs under the umbrella of sub catchment management plans. In the event that an allocation regime is determined as necessary, then principles should be determined first, including those of equity and effectiveness.</p>	<p><i>Whole</i> <i>Disallow</i></p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.8	SUBMISSION POINT ID: PC1-10765
Do you support or oppose the submission?	Oppose
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes the immediate introduction of a land-based allocation regime. The determination of allocation regimes should be subject to a full Schedule 1 process.</p> <p>Miraka considers there has been insufficient consideration, process or consultation on potential allocation frameworks to include any form of one in PC1. It has not even been determined whether an allocation regime is required, or whether sufficient improvements in water quality can be achieved through the introduction of good management practice for all in conjunction with Best Management Practices incorporated into FEPs under the umbrella of sub catchment management plans. In the event that an allocation regime is determined as necessary, then principles should be determined first, including those equity and effectiveness.</p>	<p><i>Whole</i> <i>Disallow</i></p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Rule 3.11.5.3; Schedule 2	SUBMISSION POINT ID: PC1-11056; PC1-10648
Do you support or oppose the submission?	Oppose
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports the use of Certified Industry Schemes, as a way of providing guidance, consistency and rigour to the development and monitoring of Farm Environment Plans. It does not agree with the Department of Conservation's contention that Certified Industry Schemes would be outside of the plan or that there would not be independent rigour and auditing. Industry Scheme requirements can be specified in a plan schedule, and independent rigour and auditing can be included in these requirements.	Whole Disallow

Federated Farmers of NZ; ID 74191; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of NZ	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General; 3.11.1; 3.11.2; Objective 5; Policy 1; Policy 2; Policy 3; Policy 4; Policy 5; Policy 6; Policy 7; Policy 8; Policy 9; Policy 10; Policy 11; Policy 12; Policy 13; Policy 14; Policy 16; Policy 17; 3.11.4; 3.11.4.7; 3.11.4.8; 3.11.5; 3.11.5.7; Schedule A; Schedule B; Schedule C; Schedule 1; Schedule 2; Table 3.11-1; Additions to Glossary of Terms	SUBMISSION POINT ID: PC1-10862, PC1-10810, PC1-10811, PC1-10814, PC1-10815, PC1-12754, PC1-12755, PC1-10816, PC1-10817, PC1-10820, PC1-10821, PC1-10822, PC1-10823, PC1-10825, PC1-10826, PC1-10827, PC1-10828, PC1-10829, PC1-10830, PC1-10832, PC1-10834, PC1-10837, PC1-10838, PC1-10840, PC1-10841, PC1-10844, PC1-10845, PC1-10847, PC1-10850, PC1-10852, PC1-10854, PC1-10857, PC1-10860, PC1-10858
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
In so far as Federated Farmers has provided more detailed tracked changes and reasons in support of its original submission in its submission to Variation 1, and in so far as Miraka has made Further Submissions on Federated Farmers' submission to Variation 1, Miraka considers that it has cross submitted on the whole of Federated Farmers' submission to PPC1 to the same effect on each individual matter. Any submission points on PC1 that are not superseded by the submission points on V1 and covered by our Further Submission on V1 are opposed in their entirety. We reserve our position on specific wording.	Part Allow Part Disallow

Fertiliser Association of New Zealand; ID 73305; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Background and explanation	SUBMISSION POINT ID: PC1-9698
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter: “FANZ supports an approach which manages and controls farm system losses which are likely to have an adverse effect on the environment, while providing for innovation and flexibility in farm system inputs. In this regard, FANZ cautions against the approach where land use change is constrained as a simplistic input control. Constraints on land use change should be clearly linked to controlling output loss limits for contaminants of concern....”</p>	<p>Part; “RETAIN the overall principles provided for in the Background and Explanation”, with a caution about: ... Not constraining land use activity as a blunt input control, but rather link policies and controls to effects based on farm system loss of contaminants. Allow</p> <p>NOTE: this was in the original submission but not included in the Summary of Submissions. It is important that the original decision sought be retained.</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-11168
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 1	SUBMISSION POINT ID: PC1-9699
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 1	SUBMISSION POINT ID: PC1-9707
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-9712
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: PC1-9789
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka strongly supports the FANZ submission point, for the same reasons:</p> <p>Policy 7 introduces principles which apply to a separate (future) planning process, and increases uncertainty for land managers by reference to 'future allocation' with no indication of timeframes, and by reference to "land suitability" with no reference to how that might be assessed and what impact it may have on current or future investment in land development.</p> <p>FANZ cautions against limiting innovation and flexibility in farming practices by restricting land use based solely on current perception of "land use suitability" without linking it to an effects-based measure. Controls based on current perceptions of land use suitability are in effect, input controls, not necessarily based on outcomes."</p> <p>Further, Miraka considers the reference to 'land suitability' as a future allocation principle to be pre-emptive. Full Schedule 1 processes should be followed to determine principles for future allocation.</p> <p>Miraka also supports FANZ's submission about footnote 5 to Policy 7 that explicitly states land use suitability excludes moderating effects of potential mitigations as well as excluding economic social and cultural criteria, where it should include them.</p>	<p>Whole Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 16	SUBMISSION POINT ID: PC1-9801
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>The reference to Best Management Practice should be worded Good Management Practice to be consistent with terminology used elsewhere, and to ensure that the flexibility provided by Policy 16 is not constrained by a higher bar.</p> <p>There are other parts of the wording of Policy 16, not referred to in the FANZ submission, which also potentially make it more difficult, not less, to obtain the flexibility for development for tangata whenua ancestral land. Miraka retains its position on these.</p>	<p>Whole Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.8	SUBMISSION POINT ID: PC1-9839
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p> <p>Miraka supports the potential development of allocation frameworks for discharge to water in the future (if determined necessary), based on information gathered following the implementation of Stage 1 of the Plan Change and the development of principles of allocation, in consultation.</p>	<p>Whole Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.9	SUBMISSION POINT ID: PC1-9842
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.12	SUBMISSION POINT ID: PC1-10615
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Rule 3.11.5.4	SUBMISSION POINT ID: PC1-10626
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka continues to oppose the 75th percentile nitrogen leaching approach on the two main grounds of socio-economic equity and effectiveness in improving water quality, as per our original submission on Schedule 1 [PC1-10650].</p> <p>With reference to nitrogen, there are other mechanisms that could guide reductions in N loss such as Farm N Surplus and uniform percentage reductions that are relevant to sub catchment priorities. Miraka strongly contends that during Stage 1 of PC1, specified practice changes that sit within FEPs should drive reductions in nitrogen loss.</p> <p>While retaining our opposition to the 75th percentile nitrogen leaching approach, we support the reasons that FANZ has given for opposing clause iv and support the reduction of N loss by all land users using best practicable options:</p> <p>“Although requiring all farms with N loss greater than the 75th percentile to truncate their N loss to below the 75th Percentile by 2026 will provide a reduction in N loss of the catchment, FANZ considers it is a less fair and less efficient approach than simply requiring a uniform percentage reduction by all land users. This consideration is particularly relevant while the allocation system is yet to be determined.</p> <p>The principle of "shifting the bell curve" can be achieved by truncating all high N loss properties, regardless of their level of productivity, climate and soil characteristics, however this approach does not take into consideration that not all land users should be compared to the mean N loss for the region/ catchment. Farm systems fall into different categories of soil drainage, rainfall and production systems. Some of those land users may</p>	<p>Whole Allow (with reservation regarding retention of the 75th percentile nitrogen leaching value reference)</p>

well be operating a very good management practice for their particular soil and rainfall conditions and production systems with little scope to reduce N loss to a 75th%iles other than by changing their farm system. If they are also performing very well for the N loss per unit of production, then cutting these farms back may be the more expensive option for achieving a relatively modest overall regional N loss reduction in advance of establishing an allocation system. In the absence of data with which to decide an allocation system the decision to truncate N loss above the 75%iles seems to be a significant step toward allocation already.

Page 11 of document# 6551310, by Doole, Quinn, Wilcock and Hudson, titled 'Simulation of the proposed policy mix for the Healthy Rivers Wai Ora process,' states that:

" ... reductions for mean leaching in the Wai pa/Franklin and Upper Waikato districts associated with the enactment of the 75th percentile policy being estimated at 4% and 5%, respectively."

On the face of it, this seems a very modest reduction in average N loss when it might result in significant cutting back of some of the higher producing farms in the region, depending on their ability to implement mitigations for their soil and rainfall conditions.

The reports of Doole, "Description of mitigation options defined within the economic model for HRWO- Project description of options and sensitivity analysis", Doc# 3606268 says that for representative dairy farm in Waipa - Franklin catchment:

"Average nitrogen leaching was 30 kg N/ha. Based on the above mitigations this farm can achieve a 10% reduction in nitrogen leaching per hectare with a minimal impact on profit and production. This level of nitrogen reduction would reduce operating profit per hectare by 2% and production in milksolids by 3%. Any further mitigation measures beyond this 10% level of nitrogen reduction impacts operating profit and production more significantly" [page 25, Appendix 1)

And for the Upper Waikato catchment:

"Average nitrogen leaching was 40± kg N/ha on the baseline. Based on the above mitigations, a 10% reduction in nitrogen leaching per hectare can be achieved with a 5% reduction in profit and 3% reduction in production. A

<p><i>further 10% nitrogen loss reduction impacts operating profit and production by a similar proportion. Reductions in nitrogen leaching of greater than 20% generally have an impact on operating profit and production of more than 10%.” [page 29, Appendix 1)</i></p> <p>Given that a typical dairy farm may find it difficult to reduce N loss by more than 10 -20 %, caution is raised about the requirement to truncate the top 25 % of N leaching properties to achieve a very modest 5% reduction across the board.</p> <p>Particularly so, if it is considered this requirement is in effect a significant step in allocation, in advance of any allocation process being evaluated or decided.</p>	
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.7	SUBMISSION POINT ID: PC1-10632
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 1	SUBMISSION POINT ID: PC1-10650
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter: It is noted Schedule 1 (2) (d) (i) requires: “matching land use to land capability” Comment: In the absence of defining a robust and preferred method by which this should be achieved and given land use “suitability” is still a concept being developed under the National Science Challenge, and also referenced for a later stage in the Regional Plan, FANZ considers this bullet should be deleted. Effects based assessments are addressed adequately by the requirements listed in the remaining bullets.</p>	<p>Part; AMEND Schedule 1(2) to read: “(d) An assessment of appropriate land use and grazing management for specific areas on the farm in order to maintain and improve the physical and biological condition of soils and minimise the diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens to water bodies, including: (i) matching land use to land capability; and (ii) (i) identifying areas not suitable for grazing; and (iii) (ii) stocking policy to maintain soil condition and pasture cover; and (iv) (iii) to appropriate location and management of winter forage crops; and (iv) (iv) suitable management practices for strip grazing.” Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Good Management Practice	SUBMISSION POINT ID: PC1-10660
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fertiliser Association of New Zealand	ORIGINAL SUBMITTER ID: 73305
ADDRESS OF ORIGINAL SUBMITTER: PO Box 11519, Manners Street, Wellington 6142	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition – Diffuse discharge	SUBMISSION POINT ID: PC1-10666
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

Fonterra Co-operative Group Ltd; ID 74057; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-12759
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter, and in our original submission.</p> <p>Miraka also sought an amendment to Policy 2, and continues to seek that. Our support of Fonterra's decision sought is as a potential alternative to our own.</p>	<p>Whole Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-10470
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes treating the management of nitrogen in a fundamentally different way to the management of the other contaminants in the Plan. While we agree that nitrogen discharges are influenced by many variables that may need to change during and between seasons in response to climatic and market conditions, the same could be said for other contaminants to some extent. We maintain that the specification of</p>	<p>Whole Disallow</p>

<p>mitigation actions in a Farm Environment Plan can and should allow for seasonal variability and could also provide for alternative mitigations with similar effect.</p> <p>Miraka opposes the management of nitrogen through a numeric discharge limit, and strongly opposes the 75th percentile nitrogen leaching value approach, for the reasons given in our original submission.</p>	
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 6	SUBMISSION POINT ID: PC1-10473
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports a redrafting of Policy 6 in so far as it would enable land use change which occurs without changes in diffuse discharges of contaminants to be considered as a discretionary activity.</p> <p>We continue to support clear exception to restrictions on land use change for tangata whenua ancestral lands (Policy 16).</p>	<p>Part Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: PC1-10474
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka strongly supports the removal of any reference to future allocation frameworks and particularly the indication of a preferred framework, as this is pre-emptive.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.2	SUBMISSION POINT ID: PC1-10492
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka opposes Fonterra's requested change to specify nitrogen discharge limits over only the effective hectares of the property or enterprise and not over the whole property or enterprise, and its associated new definition of effective hectares. We oppose this as, while it purports to be on Rule 3.11.5.2, it introduces the concept of effective hectares as a parameter for nitrogen discharge properties, and would in effect require all properties over 20 hectares to calculate nitrogen discharge in this manner to determine which would then qualify as a permitted activity under Rule 3.11.5.2. We are concerned that it also undermines the definition and concept of enterprise, and in so doing	Part; AMEND Rule 3.11.5.2 (4) b ii to read: "...b. The diffuse discharge of nitrogen from the property or enterprise does not exceed either:...whichever is the lesser, over the <u>effective hectares of the whole</u> property or enterprise assessed in accordance with Schedule B." 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</u>

will create a significant disincentive for land owners to apply mitigations in the form of retiring riparian margins and other vulnerable parts of their properties.

Further, the way the relief sought is structured, it would appear to place a much more difficult barrier. The submission leaves the calculation of the Nitrogen Reference Point as per Schedule B (i.e. over the whole property or enterprise), but then requires the nitrogen discharge limit (on an effective hectare basis) to be to be the lower of 15kg or the NRP (calculated on a property/enterprise basis). This essentially means that any property or enterprise with ANY forestry or other activity that is lower than its farming operation, irrespective of intensity (e.g., right down to 10kg N/ha/yr) would fail the test, meaning no farming over 20 hectares could be a permitted activity.

Further, we believe Fonterra’s concern that intensive farming activities would potentially be allowed “to continue to adopt sub optimal management practices” is unfounded as such practices would be caught under other provisions and by our approach of requiring Good Management Practices to be applied by all and be Farm Environment Plan provisions.

excludes indigenous forest, plantation forest, closed canopy scrubland and protected wetlands."

Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.6	SUBMISSION POINT ID: PC1-10506
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter in relation to equity of activities (intensification of same land use and change in land use with the same or less potential effect on water quality), with both activities to be considered under Discretionary Activity Rules. However, we seek retention of the existing list of matters over which the Waikato Regional Council restricts its discretion as being sufficient, and oppose Fonterra’s suggestion to replace these with a focus on nitrogen discharge alone.</p> <p>Miraka notes that Fonterra’s request does not include land use change associated with development of tangata whenua ancestral land, and seek that this also be given restricted discretionary activity status.</p>	<p>Part; DELETE Rule 3.11.5.6 and REPLACE with a Rule that reads: <u>"3.11.5.6 Discretionary Activity Rule – The use of land for farming activities</u> <u>The following activities are discretionary activities (requiring resource consent):</u> <u>1. The use of land for farming activities 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 that does not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5"</u></p> <p>Allow</p> <p>Part; subject to the following standards and terms: <u>"a. The three-year rolling average does not exceed the Nitrogen Reference Point, or where no Nitrogen Reference Point has been calculated the average nitrogen loss for the property or enterprise over the three-year period ending 30 June of the year preceding the year the application is made."</u></p> <p>Disallow, and retain the original matters over which the Waikato Regional Council restricts its discretion</p>

	<p>Part; <u>2. “Any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā River catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares:</u> i. <u>Woody vegetation to farming activities; or</u> ii. <u>Any livestock grazing other than dairy farming to dairy farming; or</u> iii. <u>Arable cropping to dairy farming; or</u> iv. <u>Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.”</u> Allow, but include also include provision for flexibility for development of tangata whenua ancestral lands (including land use change) as a Restricted Discretionary Rule.</p> <p>Part; <u>Subject to the following standards and terms:</u> a. <u>The three-year rolling average does not exceed the Nitrogen Reference Point, or where no Nitrogen Reference Point has been calculated the average nitrogen loss for the property or enterprise over:</u> b. <u>Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C.</u> Disallow, and retain the original matters over which the Waikato Regional Council restricts its discretion.</p> <p>Part; “AND AMEND other parts of PPC1 as necessary to clarify that land use change within a property or enterprise (>4.1 ha) that does not increase the total area within that property devoted to that land use beyond 4.1 hectares is not caught by this rule.” Allow</p>
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.7	SUBMISSION POINT ID: PC1-10513
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports changes to Rule 3.11.5.7 in consequence of the changes sought to Rule 3.11.5.6	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 2	SUBMISSION POINT ID: PC1-10561
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Additions to Glossary of Terms	SUBMISSION POINT ID: PC1-10616
Do you support or oppose the submission? Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes Fonterra's requested change to specify nitrogen discharge limits over only the effective hectares of the property or enterprise and not over the whole property or enterprise, and its associated new definition of effective hectares.</p> <p>We oppose this as it undermines the definition and application of enterprise, and in so doing will create a significant disincentive for land owners to apply mitigations in the form of retiring riparian margins and other vulnerable parts of their properties.</p>	<p>Part; 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>Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition – Certified Industry Scheme	SUBMISSION POINT ID: PC1-10583
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	<p>Whole Allow</p>

Horticulture New Zealand (HortNZ); ID 73801; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-9899
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Part; “AND AMEND to ensure that statutory methods, other than the non-complying activity land use change rules, are discharge controls, not section 9 RMA land use controls” Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 1	SUBMISSION POINT ID: PC1-9939
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka also sought an amendment to Objective 1, and continues to seek that. Our support of HortNZ's decision sought is in addition to our own.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 3	SUBMISSION POINT ID: PC1-9945
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka supports the consideration of contaminant load reduction targets at the sub-catchment level as an alternative to Table 3.11-1 attribute targets.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 4	SUBMISSION POINT ID: PC1-10005
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka supports the consideration of contaminant load reduction targets at the sub-catchment level as an alternative to Table 3.11-1 attribute targets	Part; That part of the submission point that seeks inclusion of contaminant load reduction targets for each sub-catchment Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Reasons for adopting Objective 1	SUBMISSION POINT ID: PC1-10012
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka supports the consideration of contaminant load reduction targets at the sub-catchment level as an alternative to Table 3.11-1 attribute targets.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Reasons for adopting Objective 2	SUBMISSION POINT ID: PC1-10015
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Reasons for adopting Objective 3	SUBMISSION POINT ID: PC1-10016
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Reasons for adopting Objective 4	SUBMISSION POINT ID: PC1-10017
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 1	SUBMISSION POINT ID: PC1-10050
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka also sought an amendment to Policy 1(b), and continues to seek that. Our support of HortNZ's decision sought is in addition to our own, with consequent renumbering of sub-clauses (i.e. their (b) becoming (ba), etc.)	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 9	SUBMISSION POINT ID: PC1-10078
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports the strengthening of sub-catchment scale management, and is open to considering collaborative management and catchment collective responses. However, we reserve our position on the specific wording, and also on the relationship between an enterprise, a sub catchment management plan and a consent. For specific catchments where an entity covers a large part of it, that entity's Farm Environment Plan may in effect almost be a sub-catchment management plan. However, in most sub catchments, we envisage a sub catchment management plan that identifies the issues, loads, monitoring data and requirements and gives	Part: strengthening of sub-catchment scale management, adaptive management and good management practices and the use of input loads across these policies Allow Part: relationship between an enterprise, a sub catchment management plan and a consent Disallow

guidance on appropriate management practices and mitigations. Under this, there will be permitted or consented activities with Farm Environment Plans, either as individual properties/enterprises, or under a Certified Industry Scheme.	
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.7	SUBMISSION POINT ID: PC1-10110
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter. Miraka also sought an amendment to 3.11.4.7, and continues to seek that. Our support of HortNZ's decision sought is in addition to our own, and does not replace it.</p>	<p>Part; AMEND Method 3.11.4.7 to read: "... b. Researching <u>and making publicly available</u>: i. The quantum of contaminants that can be discharged at a sub-catchment and Freshwater Management Unit scale while meeting the Table 3.11-1 water quality attribute targets <u>and/or sub-catchment load targets identified Schedule 1C Table XX.</u> Allow</p> <p>Part; AMEND Method 3.11.4.7 to read: iii. Tools for measuring or modelling discharges from individual properties, enterprises and sub-catchments, and how this can be related to the Table 3.11-1 water quality attribute targets <u>and/or sub-catchment load targets identified Schedule 1C Table XX.</u>" Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.9	SUBMISSION POINT ID: PC1-10112
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5	SUBMISSION POINT ID: PC1-10162
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p> <p>Miraka supports the strengthening of sub-catchment scale management, and is open to considering a consenting pathway for catchment collectives. However, we reserve our position on the specific wording, and also on the relationship between an enterprise, a sub catchment management plan and a consent. For specific catchments where an entity covers a large part of it, that entity's Farm Environment Plan may in effect almost be a sub-catchment management plan. However, in most sub catchments, we envisage a sub catchment management plan that identifies the issues, loads, monitoring data and requirements and gives guidance on appropriate management practices and mitigations. Under this, there will be permitted or consented activities with Farm Environment Plans, either as individual properties/enterprises, or under a Certified Industry Scheme.</p>	<p>Part: strengthening of sub-catchment scale management, adaptive management and good management practices and the use of input loads across these policies</p> <p>Allow</p> <p>Part: relationship between an enterprise, a sub catchment management plan and a consent</p> <p>Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 1	SUBMISSION POINT ID: PC1-10215
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p> <p>Miraka strongly supports sub catchment scale management, and therefore supports the development of sub catchment scale management plans. However, we believe such a plan should be developed at the sub catchment community level, with technical input from the Waikato Regional Council, to provide water quality or catchment load targets, identify issues and provide guidance on appropriate management practices and mitigations. A sub catchment plan should not be developed solely by a legal entity for the purposes of a consent application, but rather be the umbrella document under which specific farm or entity plans and consents are developed. Miraka is concerned that its use as a means for a legal entity to apply for a consent could replace its value as a means of community education, engagement and practice change.</p>	<p>Part (concept) “ADD a NEW Schedule 1C to provide for sub-catchment scale solutions” Allow</p> <p>Part (detail, in particular clauses 3, 5 and 6) Disallow</p> <p>Part (Schedule 1C Table XX of sub-catchment load targets) Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 2	SUBMISSION POINT ID: PC1-10224
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Additions to Glossary of Terms	SUBMISSION POINT ID: PC1-10227
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Part; ADD a NEW definition for Catchment Collective to read: <u>"Definition - Catchment collective</u> <u>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> Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition – Best management practice	SUBMISSION POINT ID: PC1-10225
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Enterprise	SUBMISSION POINT ID: PC1-10232
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Part; AMEND the definition of Enterprise/s to read: "Enterprise/s: means one or more parcels of land (or parts of parcels of <u>land</u>) held in single or multiple ownership to support the primary production activities undertaken <u>principle land use or land which the principle land use is reliant upon</u> , and constitutes a single operating unit for the purposes of management." Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand (HortNZ)	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition – Good Management Practice	SUBMISSION POINT ID: PC1-10233
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

Southern Pastures Limited Partnership; ID 74062; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Southern Pastures Limited Partnership	ORIGINAL SUBMITTER ID: 74062
ADDRESS OF ORIGINAL SUBMITTER: C/- Tompkins Wake, Attn: Marianne MackIntosh, PO Box 258, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 1	SUBMISSION POINT ID: PC1-11098
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Southern Pastures Limited Partnership	ORIGINAL SUBMITTER ID: 74062
ADDRESS OF ORIGINAL SUBMITTER: C/- Tompkins Wake, Attn: Marianne MackIntosh, PO Box 258, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-11099
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka also sought an amendment to clause d., and continue to seek that. Our support of Southern Pastures Limited Partnership's decision sought is in addition to our own.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Southern Pastures Limited Partnership	ORIGINAL SUBMITTER ID: 74062
ADDRESS OF ORIGINAL SUBMITTER: C/- Tompkins Wake, Attn: Marianne MackIntosh, PO Box 258, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 6	SUBMISSION POINT ID: PC1-11102
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p> <p>Miraka continues to support the Policy 6 restrictions on land use change that would result in an increase in diffuse discharges (with Policy 16 exceptions). We continue to support land use change that demonstrates decreases in diffuse discharges. We now also seek to enable land use changes within a property or enterprise that cause no net increase and that apply best management practice, and support the Southern Pastures Limited Partnership submission on that.</p>	<p>Part;</p> <p>ADD a new policy:</p> <p><u>"Policy [X2] - Flexibility for land use change Land use change consent applications for activities that will not result in an increased diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens across a property or enterprise will generally be granted, taking into account:</u></p> <ul style="list-style-type: none"> i. <u>Implementation of best management practice actions for nitrogen, phosphorus, sediment and microbial pathogen for the proposed land use through the use of Farm Environment Plans for each property or enterprise; and</u> ii. <u>The creation of positive economic, social and cultural benefits for the Waikato Region."</u> <p>Allow</p>

The Royal Forest and Bird Protection Society of New Zealand Incorporated; ID 74122; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
ADDRESS OF ORIGINAL SUBMITTER: PO Box 2516, Christchurch 8140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-8188
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports Forest and Bird’s contention that good management practice be required for all landowners, as it is practice change that will result in water quality improvement and all land owners should bear the responsibility for this. Miraka also agrees that best management practices may be needed according to the sub-catchment, issue and farming systems. Miraka welcomes clarification and detail on good and best management practices, but considers that the combination of Council guidelines and expert practitioner input into Farm Environment Plans is the best way to ensure that the practices are appropriate for the situation. Miraka opposes a regulatory schedule of good and best practice, as the most appropriate practices depend on a range of factors, including biogeophysical and farm system. A regulated practice may have a positive environmental impact in one situation, but a negative impact in another. There must be discretion by the experts to include the most appropriate practices from those recommended in Council guidelines.</p> <p>Miraka does not consider the 75th percentile requirement should be included in policy, and does not support Forest & Bird seeking that it be</p>	<p>Part; “AND AMEND to define with clarity good and best management practices, through the use of schedules which set these out in detail AND AMEND to require that good management practice be achieved in the first instance and then best management practice if needed to achieve freshwater objectives”.</p> <p>Allow in part</p> <p>Part; “AND AMEND to clarify the requirement for the 75th percentile of dairy farmers being required to reduce by including it in policy”.</p> <p>Disallow</p> <p>Part; “AND DELETE all reference to Certified Industry Schemes”.</p> <p>Disallow</p>

only the 75th percentile of dairy farmers. All farms that are currently not applying good practice should be required to do so.

Miraka opposes the submission to remove of Certified Industry Schemes, as these are a way of providing guidance, consistency and rigour to the development and monitoring of Farm Environment Plans. It does not agree that PPC1 would be unenforceable against members of these schemes, provided appropriate checks and balances are put in place through robust third-party auditing.

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
ADDRESS OF ORIGINAL SUBMITTER: PO Box 2516, Christchurch 8140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 5	SUBMISSION POINT ID: PC1-8226
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka does not support the qualification that Forest & Bird seeks, which would allow the ability of tangata whenua to actively sustain a relationship with ancestral land and with the rivers and other water bodies in the catchments ONLY when they are achieving the water quality attributes and targets in Table 3.11-1. This is blatantly inequitable, putting the burden of achieving water quality attributes and targets directly onto tangata whenua irrespective of what actions other landowners in a sub catchment are required to undertake, and removing their right to sustain relationships with the natural world unless such targets are achieved. It also places the burden of water quality improvement on those who have, due to historical impediments, generally had the least opportunity to develop their land, resulting in both lesser economic opportunity to apply alternatives and also probably lesser contribution in terms of contaminants over a sustained period of time.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
ADDRESS OF ORIGINAL SUBMITTER: PO Box 2516, Christchurch 8140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-8252
Do you support or oppose the submission? Oppose to the main part, support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes the removal of a tailored, risk-based approach. Biogeophysical factors, farm systems, good management practices, contaminant issues and environmental impacts are all complex and diverse. Effective change in practice and improvement in water quality requires an understanding of the specific interactions of all of these factors at a meaningful scale. The environmental risk needs to be assessed at the farm scale, and appropriate and effective practices and mitigations must be put in place at the same scale. Miraka opposes the removal of the use of Farm Environment Plans and Certified Industry Schemes, as we see these as being effective mechanisms to improve practice, reduce contaminant discharge and improve water quality. Similarly, Miraka opposes the removal of the requirement for the same level of rigour within Farm Environment Plan, whether established with a resource consent or through Certified Industry Schemes.</p> <p>Miraka opposes the application of the 75th percentile, and also opposes Forest & Bird's submission that only the 75th percentile of <u>dairy</u> farms be required to reduce their discharges. Requirements to reduce discharge should be based on the extent to which practices are currently not meeting best practice and the issues specific to the sub catchment and receiving environment. Farms that are currently not applying good practice should be required to do so.</p>	<p>Part; AMEND Policy 2 to read as follows: "Policy 2: Tailored approach to rReducing diffuse discharges from farming activities. Manage and require reductions in sub-catchment wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming activities on properties and enterprises by: a. Taking a tailored, risk-based approach to define mitigation actions on the land that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a Farm Environment Plan either associated with a resource consent, or in specific requirements established by participation in a Certified Industry Scheme <u>Requiring the 75th percentile of dairy farms to reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to below the 75th percentile level by 2026;</u> b. Requiring the same level of rigour in developing, monitoring and auditing of mitigation actions on the land that is set out in a Farm Environment Plan, whether it is established with a resource consent or through Certified Industry Schemes</p> <p>Disallow</p> <p>Part; AMEND Policy 2 to read as follows: ...</p>

Miraka supports Forest & Bird's submission seeking the requirements that all farm activities operate using good management practices. This is equitable, and will result in improved water quality across the board. Miraka also supports the use of best management practices where further reductions in contaminant discharge are necessary, as defined by sub catchment management plans.

c. where further reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens are necessary, these are to be achieved by the use of best management practices;

d. where further reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens are necessary, these are:

(i) proportionate to the amount of current discharge for the activity operating at best management practices (those discharging more are expected to make greater reductions); and

(ii) proportionate to the scale of water quality improvement required in the sub-catchment;

~~d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and~~

e. mitigation actions required to meet the reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens needed to achieve the losses under Policy 2(b) are specified in a Farm Environment Plan;

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
ADDRESS OF ORIGINAL SUBMITTER: PO Box 2516, Christchurch 8140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 6	SUBMISSION POINT ID: PC1-8258
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka is strongly opposed to the suggested removal of the Policy 16 exception from this policy. There is a legacy of historical impediment to development of tangata whenua ancestral land that must not be continued.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
ADDRESS OF ORIGINAL SUBMITTER: PO Box 2516, Christchurch 8140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: PC1-8259
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka is strongly opposed to the suggested removal of the principle of flexibility of development of tangata whenua ancestral land in any future allocation framework. There is a legacy of historical impediment to development of tangata whenua ancestral land that must not be continued.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
ADDRESS OF ORIGINAL SUBMITTER: PO Box 2516, Christchurch 8140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 10	SUBMISSION POINT ID: PC1-8263
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
ADDRESS OF ORIGINAL SUBMITTER: PO Box 2516, Christchurch 8140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 12	SUBMISSION POINT ID: PC1-8304
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
ADDRESS OF ORIGINAL SUBMITTER: PO Box 2516, Christchurch 8140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 13	SUBMISSION POINT ID: PC1-8325
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
ADDRESS OF ORIGINAL SUBMITTER: PO Box 2516, Christchurch 8140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 16	SUBMISSION POINT ID: PC1-8336
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka is strongly opposed to the suggested deletion of Policy 16 flexibility of development of tangata whenua ancestral land. There is a legacy of historical impediment to development of tangata whenua ancestral land that must not be continued.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
ADDRESS OF ORIGINAL SUBMITTER: PO Box 2516, Christchurch 8140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.2	SUBMISSION POINT ID: PC1-8210
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka opposes the removal of Certified Industry Schemes, as these are a way of providing guidance, consistency and rigour to the development and monitoring of Farm Environment Plans.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
ADDRESS OF ORIGINAL SUBMITTER: PO Box 2516, Christchurch 8140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.12	SUBMISSION POINT ID: PC1-8414
Do you support or oppose the submission? Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports the development of guidelines that outline good and best management practice for various land uses and situations. However, given the complexity of biogeophysical factors, farm systems, practices, contaminant issues and environmental impact interactions, we consider that such guidelines are best utilised in selecting appropriate and effective practices within a Farm Environment Plan. There may be some good management practices that can be applied across the board and therefore regulated, but in the main they should not be specified in schedules and rules. Risk-based selection of tools, that may change over time, should be facilitated.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5	SUBMISSION POINT ID: PC1-8194
Do you support or oppose the submission? Oppose in part and Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka does not support the inclusion of the 75th percentile requirement in the rules, as it is inequitable and does not take into account biophysical factors or put the focus on that which can be changed in the short term, i.e. management practices.</p> <p>Miraka supports Forest and Bird’s contention that good management practice be required for all landowners, as it is practice change that will result in water quality improvement and all land owners should bear the responsibility for this. Miraka also agrees that best management practices may be needed according to the sub-catchment, issue and farming systems. Miraka welcomes clarification and detail on good and best management practices, but considers that the combination of Council guidelines and expert practitioner input into Farm Environment Plans is the best way to ensure that the practices are appropriate for the situation. Miraka opposes a regulatory schedule of good and best practice, as the most appropriate practices depend on a range of factors, including biogeophysical and farm system. A regulated practice may have a positive environmental impact in one situation, but a negative impact in another. There must be discretion by the experts to include the most appropriate practices from those recommended in Council guidelines.</p>	<p>Part; “AMEND the rules to remove the ambiguity surrounding the 75th percentile AND include the 75th percentile requirement in the rules, not in Schedule 1” Disallow</p> <p>Part; “AND AMEND to adopt require good management practices by all landowners, AND AMEND to ensure that where reductions beyond good management practices are needed to achieve water quality, the rules provide for best management practices.” Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: The Royal Forest and Bird Protection Society of New Zealand Incorporated	ORIGINAL SUBMITTER ID: 74122
ADDRESS OF ORIGINAL SUBMITTER: PO Box 2516, Christchurch 8140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.3; Schedule 2	SUBMISSION POINT ID: PC1-8427; PC1-8205
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka opposes the removal of Certified Industry Schemes, as these are a way of providing guidance, consistency and rigour to the development and monitoring of Farm Environment Plans. It does not agree that PPC1 would be unenforceable against members of these schemes, provided appropriate check and balances are put in place.	Whole Disallow

Tuaropaki Trust; ID 73769; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuaropaki Trust	ORIGINAL SUBMITTER ID: 73769
ADDRESS OF ORIGINAL SUBMITTER: 54 Tuwharetoa Street, PO Box 441, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Reasons for adopting Objective 4	SUBMISSION POINT ID: PC1-3014
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
There is an indication within the Plan Change that the basis for future allocation mechanisms may have been pre-judged. No evidence is provided to support land suitability as the most efficient or equitable allocation mechanism. Determination of future allocation mechanisms must be subject to a full public process.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuaropaki Trust	ORIGINAL SUBMITTER ID: 73769
ADDRESS OF ORIGINAL SUBMITTER: 54 Tuwharetoa Street, PO Box 441, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-3007
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Complex integrated enterprises should be allowed to retain management flexibility in their land use activities while meeting overall positive environmental outcomes, and move land uses to their most appropriate locations.	Part; "AMEND PPC1 to provide the ability for land use change within an enterprise, within the bounds of a total nutrient load without this being constrained by a Non-Complying Activity status rule. AND AMEND to ensure that the principle of 'existing commitment to sustainability' be used to test the current, and future Plan Change(s)

There should be equity for those who been committed and pro-active in sustainable land management practices, and they should not be disadvantaged or negatively impacted as a result of having already taken steps to minimise adverse impacts of land use activities and thereby having a reduced number and type of mitigation activities now available.	against perverse outcomes for operations that are already demonstrating a commitment to environmental sustainability.” Allow
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuaropaki Trust	ORIGINAL SUBMITTER ID: 73769
ADDRESS OF ORIGINAL SUBMITTER: 54 Tuwharetoa Street, PO Box 441, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 5; Policy 16; 3.11.5.7	SUBMISSION POINT ID: PC1-6371; PC1-3036; PC1-3009
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Tuaropaki have noted that PPC1 supports development of Maori land that has been subject to historical barriers, but that the current provision for this as a Non-Complying Activity sets a very high bar which may not give effect to the objective and policy. Miraka agrees with this, and supports Tuaropaki’s desire to change the pathway for tangata whenua ancestral lands from Non-Complying to Controlled Activity.</p> <p>We also continue to seek amendments to Policy 16 as per our original submission to ensure that additional impediments are not inadvertently imposed through the specific wording.</p>	<p>Whole re: Objective 5 and Policy 16; Allow</p> <p>Part re: Rule 3.11.5.7 “REPLACE the Non-Complying Activity status of land use change for tangata whenua ancestral lands land with a Controlled Activity rule to provide a more efficient pathway to give effect to Objective 5 and Policy 16. RETAIN the definition of tangata whenua ancestral lands.” Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuaropaki Trust	ORIGINAL SUBMITTER ID: 73769
ADDRESS OF ORIGINAL SUBMITTER: 54 Tuwharetoa Street, PO Box 441, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.7	SUBMISSION POINT ID: PC1-3009
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	<p>Part; “AMEND Rule 3.11.5.7 to provide the ability for land use change within an enterprise, within the bounds of a total nutrient load without this being constrained by a Non-Complying Activity status rule. AND ADD a permitted activity rule that provides for intra-enterprise land use change within the bounds of a net enterprise contaminant loss limit. AND CONSIDER the likely impacts of PPC1 against the full range of national policy direction and provide a review, to ensure that in meeting the environmental outcomes driven by the Vision and Strategy, the achievement of other equally important objectives are not being unnecessarily inhibited.”</p> <p>Allow</p>

Tuwharetoa Maori Trust Board; ID 73356; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuwharetoa Maori Trust Board	ORIGINAL SUBMITTER ID: 73356
ADDRESS OF ORIGINAL SUBMITTER: C/- Mitchell Daysh, PO Box 245, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-13173
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuwharetoa Maori Trust Board	ORIGINAL SUBMITTER ID: 73356
ADDRESS OF ORIGINAL SUBMITTER: C/- Mitchell Daysh, PO Box 245, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-10273
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter and in our original submission regarding support of a tailored risk based approach to managing all four contaminants as required at a sub catchment scale.	Part: tailored, risk based approach, managing all four contaminants as required at a sub catchment scale Allow
Miraka opposes the retention of clause d. and maintains the position in its original submission that the degree of reductions be proportionate to the difference between current practices and the application of Best Management Practices (those not currently applying mitigations expected to make greater reductions). The most efficient way of doing this would be	Part: Clause d. Disallow

<p>to replace the nitrogen leaching approach with a nitrogen surplus approach. This would avoid both the geophysical bias effect and the main issues with Overseer inaccuracy, and would enable a focus on actual management practices, which can be changed in the short term.</p>	
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuwharetoa Maori Trust Board	ORIGINAL SUBMITTER ID: 73356
ADDRESS OF ORIGINAL SUBMITTER: C/- Mitchell Daysh, PO Box 245, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: PC1-10301
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter, and in our original submission.</p> <p>Miraka also sought an amendment to Policy 7, and continues to seek that. Our support of Waikato and Waipa River Iwi's submission point is in addition to our own.</p> <p>Miraka strongly opposes any reference to future allocation frameworks and particularly the indication of a preferred framework, as this is pre-emptive. A full Frist Schedule process is required, and Miraka seeks to be part of that from its commencement.</p>	<p>Part Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuwharetoa Maori Trust Board	ORIGINAL SUBMITTER ID: 73356
ADDRESS OF ORIGINAL SUBMITTER: C/- Mitchell Daysh, PO Box 245, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 16	SUBMISSION POINT ID: PC1-10364
Do you support or oppose the submission? Oppose in part and Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter for the support of Policy 16 in general. The intent of Objective 5 and Policy 16 is to enable the development of tangata whenua ancestral lands and minimise new impediments. Miraka therefore seeks a Controlled or Restricted Discretionary consenting pathway for change to land use on tangata whenua ancestral land, with discretion over the use of appropriate practices and mitigations and overall discharges.</p> <p>We also continue to seek amendments to Policy 16 as per our original submission to ensure that additional impediments are not inadvertently imposed through the specific wording, specifically the removal of clauses ii and iii.</p> <p>We strongly oppose the application of land suitability allocation principles as contained in Policy 7 to Policy 16, on two grounds. Firstly, we believe that the principle of land suitability underpinning future discharge allocations requires research and detail being made public under a full First Schedule RMA process at the time of moving to a second plan change. Secondly, it is both inequitable and in opposition to Objective 5 regarding minimisation of new impediments on tangata whenua land to impose a restriction in the short term on Maori land (i.e. the land suitability principle), when it does not apply to other land or land users under Plan Change 1. In addition, Miraka finds clause iii. regarding short term targets to be achieved under Objective 3 to be ambiguous in this context. Objective 3 refers to actions by 2026 to achieve a 10 per cent change in</p>	<p>Part: clauses ii and iii Disallow</p> <p>Part: all of Policy 16 except clauses ii and iii Allow</p>

<p>water quality improvements. Policy 6 restricts land use changes to those that show decreases in diffuse discharges or to those under this Policy 16. Reading Objective 3 and Policy 6 together, it would appear that the flexibility to land use change afforded to tangata whenua ancestral lands may only apply where the proposed land use change indicates a 10 per cent improvement in water quality – i.e. little flexibility and a further impediment to development. If this is not the intended interpretation, and clause iii. has regard to the ten per cent improvements in water quality in the sub-catchment as a whole and not specifically to the proposed development of tangata whenua ancestral land, will this require greater mitigations from land owners in the rest of the sub-catchment? This requires clarification. Further, there is the potential for inequity in the development of tangata whenua ancestral land depending on the sub-catchment in which the land falls. If there is no gap between current water quality and the 80 year water quality attribute targets in a sub-catchment, then under part iii. the development may well go ahead. If there is a gap, however, it may not. Thus, it appears that historical land use in a catchment, including perhaps historical impediments, may be a key factor in determining whether new impediments to the flexibility of the use of tangata whenua ancestral lands are imposed, in contradiction to Objective 5.</p>	
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuwharetoa Maori Trust Board	ORIGINAL SUBMITTER ID: 73356
ADDRESS OF ORIGINAL SUBMITTER: C/- Mitchell Daysh, PO Box 245, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Enterprise	SUBMISSION POINT ID: PC1-10629
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

Waikato Dairy Leaders Group; ID 74049; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Dairy Leaders Group	ORIGINAL SUBMITTER ID: 74049
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Background and Explanation	SUBMISSION POINT ID: PC1-10907
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Dairy Leaders Group	ORIGINAL SUBMITTER ID: 74049
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: PC1-10944
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter, and in our original submission. In addition, Miraka supports the wording WDLG seeks “research will be undertaken in partnership with technical and industry organisations, in a manner that allows people and communities to understand the social, environmental, cultural and economic implications of the current plan, and engage in debate about any future limits” as such a level of engagement is a pre-requisite to effective and enduring Practice Change.	Whole, including the deletion of ‘land suitability’ and text on future allocation Allow

<p>Miraka strongly supports the removal of any reference to future allocation frameworks and particularly the indication of a preferred framework, as this is pre-emptive, and supports retention of wording in the Plan that subsequent plan changes will be subject to the full public process in the First Schedule of the RMA.</p>	
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Dairy Leaders Group	ORIGINAL SUBMITTER ID: 74049
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 16	SUBMISSION POINT ID: PC1-11013
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the provision of policy guidance for consent applications to change land use on tangata whenua ancestral land.</p> <p>Miraka does not support such consent applications or associated policy guidance being under a Non-Complying status, as this sets the bar too high. The intent of Objective 5 and Policy 16 is to enable the development of tangata whenua ancestral lands and minimise new impediments. Miraka therefore seeks a Controlled or Restricted Discretionary consenting pathway for change to land use on tangata whenua ancestral land, with discretion over the use of appropriate practices and mitigations and overall discharges.</p>	<p>Part: the provision of guidance, application of up to date technology and knowledge to minimise contaminant discharge and as low environmental footprint as practicable.</p> <p>Allow</p> <p>Part: “RETAIN policy guidance for Non-Complying consent applications to change land use on tangata whenua ancestral land”</p> <p>Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Dairy Leaders Group	ORIGINAL SUBMITTER ID: 74049
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.7	SUBMISSION POINT ID: PC1-11009
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka also sought an amendment to 3.11.4.7, and continues to seek that. Our support of WDLG's decision sought is in addition to our own.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Dairy Leaders Group	ORIGINAL SUBMITTER ID: 74049
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.12	SUBMISSION POINT ID: PC1-11015
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter with regard to the need to provide guidance for plan users and the importance of working with primary industry. We acknowledge that research and dissemination of knowledge into guidelines is an important component of Practice Change, which is the key to water quality improvement. Miraka supports the requirement for all activities to apply good management practice, which needs to be specified. It further seeks that Best Management Practices are identified within guidelines as a basis for the selection of relevant and appropriate mitigation actions within Farm Environment Plans. Therefore, rather than removing the text 'Best	Part; "b. <u>Work with primary industry and</u> support research into methods for reducing diffuse discharges of contaminants to water." Allow Part; "3.11.4.2: Support research and dissemination of best practice guidelines to reduce diffuse discharges. Waikato Regional Council will:

Management Practice” we seek clarity on the two terms, definitions for each, and guidelines for each.	a) Develop and disseminate best management practice guidelines for reducing the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens; and..." Disallow or replace with “...a) Develop and disseminate good management and best management practice guidelines...”
-------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Dairy Leaders Group	ORIGINAL SUBMITTER ID: 74049
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3221, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.3; 3.11.5.4	SUBMISSION POINT ID: PC1-11026; PC1-11028
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

Waikato Regional Council; ID 72890; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 1	SUBMISSION POINT ID: PC1-2985
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p> <p>Miraka supports a holistic and integrated approach to environmental stewardship, and recognises climate change as an important consideration alongside water quality. We therefore support approaches that do not favour one aspect of the environment at the expense of another. For this reason, we support a nitrogen surplus approach to reference points as this does not attempt to differentiate between nitrogen leached as nitrate and nitrogen lost to the atmosphere as nitrous oxide. Both are important, and it is crucial that we use a measure that includes both, as the nitrogen surplus approach does.</p>	<p>Whole Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-2997
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka strongly opposes the 75th percentile nitrogen leaching value, for reasons given in its original submission and centred on inequity and ineffectiveness.</p> <p>We also oppose the retention of clause d of Policy 2. Miraka maintains the position in its original submission that the degree of reductions be proportionate to the difference between current practices and the application of Best Management Practices (those not currently applying mitigations expected to make greater reductions). The most efficient way of doing this would be to replace the nitrogen leaching approach with a nitrogen surplus approach. This would avoid both the geophysical bias effect and the main issues with Overseer inaccuracy, and would enable a focus on actual management practices, which can be changed in the short term.</p>	<p><i>Whole</i> <i>Disallow</i></p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.2	SUBMISSION POINT ID: PC1-3117
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka opposes the use of an NRP based on estimates of nitrogen leached as an absolute benchmark and therefore supports a land use intensity approach.	Part; “AND AMEND Rule 3.11.5.2(4)(b)(ii) so that the reference to the nitrogen threshold (15 kgN/ha/yr) is deleted and replaced with a suitable land use intensity proxy.” Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.3	SUBMISSION POINT ID: PC1-3417
Do you support or oppose the submission? Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka opposes the use of an NRP based on estimates of nitrogen leached as an absolute benchmark. An NRP based on Nitrogen Surplus is a more equitable alternative.	Part; “AND AMEND Rule 3.11.5.3 to include a specific requirement that land users must farm such that when their farming activities are modelled in OVERSEER®, the OVERSEER® nitrogen leaching loss does not exceed the Nitrogen Reference Point for the property.” Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.4	SUBMISSION POINT ID: PC1-3420
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes the use of an NRP as an absolute benchmark.</p> <p>Miraka supports the use of an NRP as a guide or yardstick to indicate the relative amount of nitrogen loss.</p> <p>Miraka strongly opposes the decisions sought by Waikato Regional Council to restrict NRPs to exist only in association with a particular parcel or property. We consider that the enterprise approach, and the ability for an enterprise to hold an NRP, is fundamental to taking an integrated approach to sustainable management and improving water quality, and in particular to incentivising mitigations such as riparian planting or retirement of vulnerable land areas.</p>	<p>Part; “AND AMEND Rule 3.11.5.4 to include a specific requirement that land users must farm such that when their farming activities are modelled in OVERSEER®, the Overseer nitrogen leaching loss does not exceed the Nitrogen Reference Point for the property. Disallow</p> <p>Part; AND AMEND to use the Nitrogen Reference Point as a yardstick to indicate the relative amount of nitrogen being lost from a property Allow</p> <p>Part; AND AMEND Rule 3.11.5.4 and Schedule B to delete the ability for an enterprise to hold a Nitrogen Reference Point and restrict the Nitrogen Reference Point to exist only in association with a particular parcel or property Disallow</p> <p>Part; AND AMEND Rule 3.11.5.4(5)(c) to read: "A Nitrogen Reference Point has been produced for the property or enterprise in conformance to comply with Schedule B and <u>is has been</u> provided to the Waikato Regional Council" Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule B – Nitrogen Reference Point	SUBMISSION POINT ID: PC1-3553
Do you support or oppose the submission? Oppose in part and Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka strongly opposes the decision sought by Waikato Regional Council to restrict NRPs to exist only in association with a particular parcel or property. We consider that the enterprise approach, and the ability for an enterprise to hold a NRP, is fundamental to taking an integrated approach to sustainable management and improving water quality, and in particular to incentivising mitigations such as riparian planting or retirement of vulnerable land areas.</p> <p>Miraka also opposes the use of an NRP as an absolute benchmark, but in so far as there is a method for calculating an NRP, Miraka supports Waikato Regional Council’s relief sought to replace the requirement for invoices with a requirement for records more generally.</p>	<p>Part; “AMEND Schedule B to remove the ability for an enterprise to hold a Nitrogen Reference Point, and restrict the Nitrogen Reference Point to exist only in association with a particular parcel or property.</p> <p>Disallow</p> <p>Part; AND AMEND Schedule B clause g. to read: "...</p> <ul style="list-style-type: none"> i. Stock numbers as recorded in annual accounts together with stock sale and purchase invoice<u>Records of stock numbers and stock classes, births and deaths, stock movement on and off the property, grazing records and transport records;</u> ii. Dairy production data; iii. Invoices for fertiliser applied to the land<u>Records of fertiliser type and amount, application rates and fertiliser placement records;</u> iv. Invoices for<u>Records of feed supplements and amount sold or purchased, and records of supplements grown and fed on farm;</u> v. Water use records for irrigation (to be averaged over 3 years or longer) in order to determine irrigation application rates <u>mm/ha/month per irrigated block, and proof of areas irrigated (for Overseer® block setup);</u>

	<ul style="list-style-type: none"> vi. <u>Records of crops grown on the land and grazed including area and yield, and including cultivation and sowing records where available; and</u> vii. <u>A map detailing the location and area of land used for effluent irrigation;</u> viii. vii. Horticulture crop diaries and NZGAP records. ix. <u>Soil test data – including anion storage capacity</u> x. <u>A map detailing the property boundaries, areas including block (management) areas and retired areas, and the total area of non-productive areas; and</u> xi. <u>Certificate of title and legal description."</u> <p>AND ADD an advice note to read: "<u>Advice note: For the avoidance of doubt, financial information contained within the above records may be redacted (blacked out) prior to it being provided to Waikato Regional Council.</u>"</p> <p>Allow</p>
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule C – Stock exclusion	SUBMISSION POINT ID: PC1-3571
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Part; “AMEND Schedule C to ensure that it is not inconsistent with the national regulations and to ensure that together they provide for the most efficient and effective approach to stock exclusion.” Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 1	SUBMISSION POINT ID: PC1-3575
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Part; “DELETE Schedule 1 references to the 5 year rolling average and instead measure compliance based on whether the proposed mitigation actions listed in a Farm Environment Plans are completed.” Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11-2	SUBMISSION POINT ID: PC1-3651
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
“Same reasons as those given by the submitter	Part; “AMEND Map 3.11-2 by adding a comment to state that sub-catchment plans can include a multiple sub-catchment approach.” Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Best management practice	SUBMISSION POINT ID: PC1-3665
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Part; “AMEND the Glossary definition of best management practice to make it clear that the term includes mitigation that can also be achieved through changes to management practices.” Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Enterprise	SUBMISSION POINT ID: PC1-3671
Do you support or oppose the submission? Oppose in part and Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes the restriction of the definition of enterprise to just the purposes of Chapter 3.11, and considers that the same definition must apply to the term wherever it occurs in the Plan. Further, we consider that taking an enterprise approach is fundamental to an integrated approach to sustainable management and improving water quality, and in particular to incentivising mitigations such as riparian planting or retirement of vulnerable land areas.</p> <p>We support the correction of the word 'principal'.</p>	<p>Part; "AND AMEND the definition of Enterprise to read: "<u>for the purposes of Chapter 3.11</u>, means one or more parcels..."</p> <p>Disallow</p> <p>Part; AND DELETE the words "principle" and replace with "<u>principal</u>"."</p> <p>Allow</p>

Waikato and Waipa River Iwi; ID 74035; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato & Waipa River Iwi	ORIGINAL SUBMITTER ID: 74035
ADDRESS OF ORIGINAL SUBMITTER: Kahui Legal, PO Box 1654, Wellington 6140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-13187
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato & Waipa River Iwi	ORIGINAL SUBMITTER ID: 74035
ADDRESS OF ORIGINAL SUBMITTER: Kahui Legal, PO Box 1654, Wellington 6140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-3305
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter and in our original submission regarding support of a tailored risk based approach to managing all four contaminants as required at a sub catchment scale.	Part: tailored, risk based approach, managing all four contaminants as required at a sub catchment scale Allow
Miraka opposes the retention of clause d. and maintains the position in its original submission that the degree of reductions be proportionate to the difference between current practices and the application of Best Management Practices (those not currently applying mitigations expected to make greater reductions). The most efficient way of doing this would be	Part: Clause d. Disallow

<p>to replace the nitrogen leaching approach with a nitrogen surplus approach. This would avoid both the geophysical bias effect and the main issues with Overseer inaccuracy, and would enable a focus on actual management practices, which can be changed in the short term.</p>	
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato & Waipa River Iwi	ORIGINAL SUBMITTER ID: 74035
ADDRESS OF ORIGINAL SUBMITTER: Kahui Legal, PO Box 1654, Wellington 6140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: PC1-3320
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter, and in our original submission.</p> <p>Miraka also sought an amendment to Policy 7, and continues to seek that. Our support of Waikato and Waipa River Iwi's submission point is in addition to our own.</p> <p>Miraka strongly opposes any reference to future allocation frameworks and particularly the indication of a preferred framework, as this is pre-emptive. A full Frist Schedule process is required, and Miraka seeks to be part of that from its commencement.</p>	<p>Part Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato & Waipa River Iwi	ORIGINAL SUBMITTER ID: 74035
ADDRESS OF ORIGINAL SUBMITTER: Kahui Legal, PO Box 1654, Wellington 6140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 16	SUBMISSION POINT ID: PC1-3405
Do you support or oppose the submission?	Oppose in part and Support in part
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter for the support of Policy 16 in general. The intent of Objective 5 and Policy 16 is to enable the development of tangata whenua ancestral lands and minimise new impediments. Miraka therefore seeks a Controlled or Restricted Discretionary consenting pathway for change to land use on tangata whenua ancestral land, with discretion over the use of appropriate practices and mitigations and overall discharges.</p> <p>We also continue to seek amendments to Policy 16 as per our original submission to ensure that additional impediments are not inadvertently imposed through the specific wording, specifically the removal of clauses ii and iii.</p> <p>We strongly oppose the application of land suitability allocation principles as contained in Policy 7 to Policy 16, on two grounds. Firstly, we believe that the principle of land suitability underpinning future discharge allocations requires research and detail being made public under a full First Schedule RMA process at the time of moving to a second plan change. Secondly, it is both inequitable and in opposition to Objective 5 regarding minimisation of new impediments on tangata whenua land to impose a restriction in the short term on Maori land (i.e. the land suitability principle), when it does not apply to other land or land users under Plan Change 1. In addition, Miraka finds clause iii. regarding short term targets to be achieved under Objective 3 to be ambiguous in this context. Objective 3 refers to actions by 2026 to achieve a 10 per cent change in water quality improvements. Policy 6 restricts land use changes to those</p>	<p>Part: clauses ii and iii Disallow</p> <p>Part: all of Policy 16 except clauses ii and iii Allow</p>

that show decreases in diffuse discharges or to those under this Policy 16. Reading Objective 3 and Policy 6 together, it would appear that the flexibility to land use change afforded to tangata whenua ancestral lands may only apply where the proposed land use change indicates a 10 per cent improvement in water quality – i.e. little flexibility and a further impediment to development. If this is not the intended interpretation, and clause iii. has regard to the ten per cent improvements in water quality in the sub-catchment as a whole and not specifically to the proposed development of tangata whenua ancestral land, will this require greater mitigations from land owners in the rest of the sub-catchment? This requires clarification. Further, there is the potential for inequity in the development of tangata whenua ancestral land depending on the sub-catchment in which the land falls. If there is no gap between current water quality and the 80 year water quality attribute targets in a sub-catchment, then under part iii. the development may well go ahead. If there is a gap, however, it may not. Thus, it appears that historical land use in a catchment, including perhaps historical impediments, may be a key factor in determining whether new impediments to the flexibility of the use of tangata whenua ancestral lands are imposed, in contradiction to Objective 5.

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato & Waipa River Iwi	ORIGINAL SUBMITTER ID: 74035
ADDRESS OF ORIGINAL SUBMITTER: Kahui Legal, PO Box 1654, Wellington 6140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Enterprise	SUBMISSION POINT ID: PC1-3674
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

Waipa District Council; ID 67704; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waipa District Council	ORIGINAL SUBMITTER ID: 67704
ADDRESS OF ORIGINAL SUBMITTER: 101 Bank Street, Private Bag 2402, Te Awamutu 3840	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.2; 3.11.5.3	SUBMISSION POINT ID: PC1-3168; PC1-3169
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	<p>Part; “AND DELETE the provisions in Rule 3.11.5.x and any other rules specifying a property or enterprise specific Nitrogen Reference Point be calculated and not exceeded.”</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waipa District Council	ORIGINAL SUBMITTER ID: 67704
ADDRESS OF ORIGINAL SUBMITTER: 101 Bank Street, Private Bag 2402, Te Awamutu 3840	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.4; 3.11.5.5; 3.11.5.6; 3.11.5.7	SUBMISSION POINT ID: PC1-3170; PC1-3187; PC1-3189; PC1-3190
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	<p>Part; “AND AMEND to include additional matters of control, standards and terms and matters of discretion providing for offset mitigation, generally as outlined in Policy 11. The matters should specify the offset: - is for the same contaminant</p>

	<p>- occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit</p> <p>- remains in place for the duration of the consent and is secured by consent condition.”</p> <p>Allow</p>
--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waipa District Council	ORIGINAL SUBMITTER ID: 67704
ADDRESS OF ORIGINAL SUBMITTER: 101 Bank Street, Private Bag 2402, Te Awamutu 3840	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.7	SUBMISSION POINT ID: PC1-3190
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	<p>Part;</p> <p>“REPLACE Rule 3.11.5.7 with a rule that specifies that the land use changes listed in it are a discretionary activity with specific criteria to measure applications against, including whether the loss of contaminants will be the same or lower than the existing land use.</p> <p>...</p> <p>AMEND the rule to make it clear how it is to be administered where there is a mix of varied land use changes within the same property or enterprise.”</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waipa District Council	ORIGINAL SUBMITTER ID: 67704
ADDRESS OF ORIGINAL SUBMITTER: 101 Bank Street, Private Bag 2402, Te Awamutu 3840	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule C – Stock exclusion	SUBMISSION POINT ID: PC1-3234
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

Wairakei Pastoral; ID 74095; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-11406
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Re new Schedule 2:</p> <p>Miraka strongly supports a sub-catchment scale approach for the identification of water quality issues and consequent management of such issues. We therefore support Wairakei Pastoral Limited’s proposal to have a schedule of requirements for a sub-catchment management plan, and much of the content.</p> <p>However, we consider that the preparation of such plans should be at the sub-catchment community level, with technical input by Waikato Regional Council. We reserve our position on the relationship between an enterprise, a sub-catchment management plan and a consent. While this may be appropriate in certain sub-catchments, in many others a single entity-consent approach may not be appropriate and therefore the sub catchment management plan requirements should not be tied to this. We see the sub-catchment management plan as being an overarching document for the sub catchment, under which various permitted or consented activities (individual or under a Certified Industry Scheme) may operate, utilising a Farm Environment Plan approach.</p> <p>Further, we seek the development of sub catchment management plans for all sub catchments to guide ongoing activities, and not only in the situation where a land use change is sought.</p>	<p>Part;</p> <p>“The specific provisions be amended or deleted or retained or substituted as sought in Appendices A, B, C, and D attached to the submission (requested changes are also summarised in separate submission summary points under the relevant plan sections)</p> <p>AND MAKE alternative, consequential or further relief that may be required to promote sustainable management or give effect to the submission</p> <p>AND ADD a NEW Schedule 2 to read: "<u>Schedule 2: Requirements for a Sub-catchment management plan</u></p> <p><u>The purpose of a Sub-catchment management plan is to identify the current water quality in a sub-catchment (within Table 3.11-2), whether water quality is required to be maintained, protected or restored, and methods to achieve the relevant outcome required.</u></p> <p><u>In the Waikato and Waipā River Catchments, water quality outcomes and values have been determined through the Vision and Strategy.</u></p> <p><u>Sub-catchment-management plans will take a proactive, prioritised and integrated 'whole of sub-catchment' approach to managing each sub-catchment's land and water, identify specific issues and include actions to:</u></p> <ul style="list-style-type: none"> • <u>Maintain or improve water quality;</u> • <u>Conserve soil;</u> • <u>Restore and protect important biodiversity habitats;</u> • <u>Meet iwi aspirations for the Waikato River.</u>

Re new Schedule 3:

Miraka supports an adaptive management approach for the same reasons as those given by the submitter

Re new Schedule 4:

Same reasons as those given by the submitter.

Miraka strongly believes that the application of Good Management Practice should be a requirement for all farming activities. We support Wairakei Pastoral Limited's proposal for a Schedule of Farm Mitigations or Good Management Practices and its suggested content (which requires industry consultation and agreement), but subject to the understanding and agreement that the most appropriate and effective practices may differ depending on the biophysical and farm system factors at both an enterprise and sub-catchment scale. All farms must apply Good Management Practices, but the specific practices may differ.

Sub-catchment management plans are prepared by an enterprise and are intended to provide clear guidance including management actions for the preparation of **Farm Environment Plans** (as required by Schedule 1).

A Sub-catchment management plan shall as a minimum:

- a) Identify the current water quality and water quality issues at a sub-catchment level that need to be managed to achieve the Objectives to be met;
- b) Provide details of any Decision Support Tools required to measure, model, and predict discharges from individual properties and enterprises within the sub-catchment, and how they can be related to the Table 3.11-1 freshwater objectives;
- c) Establish the principles for allocation (consistent with Policy 7) of an input load based nutrient cap at the refined sub-catchment level through the development of a relationship between land use suitability and the Table 3.11-1 water quality attribute targets for the sub-catchment;
- d) Provide for the management of nitrogen, phosphorus, sediment and microbial pathogen losses in the sub-catchment through mitigation measures to be undertaken by the consent holder to ensure that the actual or potential environmental effects of carrying out the allowed land use change (including any effects from subsequent farming activities) meet Objectives 1 and 3;
- e) Provide direction for the preparation and independent auditing of Farm Environment Plans to ensure farming activities operate at Good Management Practice (**GMP**) levels or better and other mitigation options;
- f) Provide an adaptive management approach (consistent with Schedule 3) to monitor and respond to actual or potential adverse effects of the land use change on the environment (including any effects from subsequent farming activities) and associated diffuse discharges;
- g) Provide independent validation for the predictive performance and accuracy of any Decision Support Tool;
- h) Provide direction for how any proposed land use changes are to be carried out in stages;

i) Include a robust monitoring programme (real-time, reporting of contaminant losses in a suitable digital format) designed to monitor the actual or potential environmental effects of carrying out the land use change (including any effects from subsequent farming activities) over a period of 25 years from the grant of consent;

j) Require annual monitoring and mitigation reports to be prepared by the consent holder and submitted to the Waikato Regional Council (in accordance with consent conditions preferred by the enterprise) within the period of three months after each anniversary of the grant of consent"

Allow the majority of the text above; disallow the text blocked in grey

Part:

ADD a NEW Schedule 3 to read:

"Schedule 3: Adaptive Management Approach

The purpose of an Adaptive Management Approach is to allow a flexible approach to the management of natural resources and to apply a learning cycle for each decision-making step. Adaptive management is underpinned by predictive modelling to test a range of hypothetical options for their relative impacts on the current state.

A management process is then informed by the stepwise learning from changes in state modelling against the predicted outcomes. This allows informed or guided decisions rather than random exercises. Adaptive management is often required when complex ecological systems are being managed and management decisions cannot wait for final research results.

To achieve the Vision and Strategy for maintaining, protecting and restoring the health and wellbeing of the Waikato River (through Objectives 1 and 3), management at a sub-catchment level is required. To meaningfully reduce input loads and meet the water quality targets, a range of mitigation actions will be required, reinforced where appropriate by Decision Support Tools. An Adaptive Management Approach is required to ensure that mitigations and predictions do not lead to unintended consequences for the environment and communities, or delay vital actions from being taken to achieve the objectives. Such consequences may lead to financial costs for a community and a loss of confidence in mitigation

	<p><u>actions. However, because predictive analysis is carried out by modelling, an Adaptive Management Approach will need to allow for adjustment of the speed at which mitigation tools are used in terms of their actual effect on water bodies. Thus depending on the available data, properties and enterprises may need to adapt their programme by accelerating or decelerating the use of mitigation depending on the monitoring results. Consent conditions should therefore provide the flexibility to achieve these outcomes. When preparing a Sub-catchment management plan (or Farm Environmental Plan) the plan should include the following features of adaptive management (where appropriate):</u></p> <ul style="list-style-type: none"><u>a) The existing environment is established by robust baseline monitoring;</u><u>b) The extent of the environmental risk (including the gravity of the consequences if the risk is realised) is tested by the Decision Support Tools;</u><u>c) Effects that might arise can be remedied before they become irreversible;</u><u>d) The plan(s) provide for effective monitoring of adverse effects using appropriate indicators;</u><u>e) Thresholds are set to trigger remedial action(s) before the effects become overly damaging;</u><u>f) Where advanced mitigation is undertaken, it is staged and plans require certain criteria to be met before the next stage can proceed;</u><u>g) Where land use change is undertaken, it is staged and any management plans require certain criteria to be met before the next stage can proceed;</u> <p><u>and</u></p> <u>h) There is a real ability to remove all or some of the land development that has occurred if the monitoring results demonstrate criteria are not met."</u><p>Allow</p><p>Part:</p><p>ADD a NEW Schedule 4 to read: <u>"Schedule 4: Farm Mitigations for Catchment Management</u> <u>The objective is to get every farm performing at Good Management Practice (GMP) level as a starting point. It is appropriate that GMP is</u></p>
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<p><u>implemented, and these are considered necessary before any additional mitigation can be provided.</u></p> <p><u>The mitigation tools should be chosen by the relevant property or enterprise as to which is both practical and economic as part of either a Farm Environmental Plan or a Sub-catchment management plan.</u></p> <p><u>The scheduled mitigations can be used in limiting the amount of each of the four key contaminants (in the input loads for land use management) from becoming discharges to groundwater and water bodies in the Waikato River system.</u></p> <p><u>Mitigation of effects to water bodies of the four key contaminants from agricultural land have been divided based on whether they are modelled in OVERSEER or APSIM or SPASMO.</u></p> <p><u>Many management and mitigation practices serve the benefit of reducing effects for a range of contaminants, and may be included in more than one table. For example, riparian planting can reduce sediment, phosphorus and pathogens from entering water bodies.</u></p> <p><u>The summary tables below identify management and mitigation tools, and indicate if they can be incorporated into OVERSEER, or APSIM or SPASMO as appropriate.</u></p> <p><u>Microbial Pathogens</u></p> <p><u>The objective of limiting the numbers of pathogens directly affecting the water is to reduce the number of animals depositing urine and faeces into water bodies either directly or indirectly by across ground transfer.</u></p> <p><u>Phosphorus (P)</u></p> <p><u>The objective of limiting the amount of P is to limit the amount which is left on the surface of the soil which is then available to be washed directly into the water bodies and to limit the amount of soil which can be washed directly into the water bodies carrying P with it.</u></p> <p><u>Nitrogen (N)</u></p> <p><u>Nitrogen is transported from below the root zone through the soil to water bodies. The objective of limiting the amount of leaching through the soil profile is to limit the amount of N within the root zone that is then able to be washed through by excess moisture. The amount of excess N within the root zone comes from the application of N fertilisers and from the high</u></p>
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<p>concentration of N in the urine of cattle. The prime time when leaching occurs is during the winter months when the soil profile is full of moisture. Therefore, some of the following mitigation techniques are aimed at reducing the total amount of N in the soil while some are designed to reduce the amount of N in the soil during the late autumn and winter period.</p> <p><u>Sediment</u> Sediment carries with it phosphorus and other compounds that can have a negative effect on aquatic life and appearance (colour/clarity) of the water body. The objective of applying good management practice is to reduce the amount of sediment entering waterways that will have a negative effect on aquatic life, appearance, and recreational use."</p> <p>REFER to Appendix B of the submission for the accompanying tables which describe mitigation actions to manage each contaminant.</p> <p>AND MAKE alternative, consequential or further relief that may be required to promote sustainable management or give effect to the submission."</p> <p>Allow</p>
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11-1	SUBMISSION POINT ID: PC1-11257
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka strongly supports a sub-catchment scale approach to the identification of issues and their subsequent management. This includes recognition that not all contaminants are over-allocated in all sub-catchments.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 1	SUBMISSION POINT ID: PC1-11261
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 3	SUBMISSION POINT ID: PC1-11265
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 4	SUBMISSION POINT ID: PC1-11266
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2; Policy 4; Policy 5; Policy 6; Policy 7; Policy 8; Policy 9	SUBMISSION POINT ID: PC1-12956; PC1-11344; PC1-11345; PC1-11346; PC1-11347; PC1-11348; PC1-11349
Do you support or oppose the submission? Support in part Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the strengthening of sub-catchment scale management, adaptive management and good management practices and the use of input loads across these policies, and therefore supports Wairakei Pastoral Limited's proposals to this extent.</p> <p>However, we consider that sub catchment management plans should be prepared at the sub-catchment community level, with technical input by Waikato Regional Council. We reserve our position on the relationship between an enterprise, a sub catchment management plan and a consent. For specific catchments where an entity covers a large part of it, that entity's Farm Environment Plan may in effect almost be a sub-catchment management plan. However, in most sub catchments, we envisage a sub</p>	<p>Part: strengthening of sub-catchment scale management, adaptive management and good management practices and the use of input loads across these policies Allow</p> <p>Part: relationship between an enterprise, a sub catchment management plan and a consent Disallow</p>

<p>catchment management plan that identifies the issues, loads, monitoring data and requirements and gives guidance on appropriate management practices and mitigations. Under this, there will be permitted or consented activities with Farm Environment Plans, either as individual properties/enterprises, or under a Certified Industry Scheme. This approach will provide focus on priority contaminants and strengthen community engagement.</p>	
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 10; Policy 11; Policy 12; Policy 13	SUBMISSION POINT ID: PC1-11350; PC1-11351; PC1-11352; PC1-11353
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Wairakei Pastoral seeks to include the same provisions for diffuse discharges as point source discharges, to ensure a consistent and integrated approach. We agree that diffuse and point source discharges both need to be included in consideration of sub-catchment loads, and approaches to ensure sustainable management of both should be equitable. We reserve our position on the specific mechanisms to achieve this.</p>	<p><i>Part Allow</i></p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.5; 3.11.4.7; 3.11.4.8; 3.11.4.11	SUBMISSION POINT ID: PC1-11361; PC1-11364; PC1-11365; PC1-11368
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the strengthening of sub-catchment scale management, adaptive management and good management practices across these methods, and therefore supports Wairakei Pastoral Limited's proposals to this extent.</p> <p>However, we consider that sub catchment management plans should be prepared at the sub-catchment community level, with technical input by Waikato Regional Council. We reserve our position on the relationship between an enterprise, a sub catchment management plan and a consent. For specific catchments where an entity covers a large part of it, that entity's Farm Environment Plan may in effect almost be a sub-catchment management plan. However, in most sub catchments, we envisage a sub catchment management plan that identifies the issues, loads, monitoring data and requirements and gives guidance on appropriate management practices and mitigations. Under this, there will be permitted or consented activities with Farm Environment Plans, either as individual properties/enterprises, or under a Certified Industry Scheme.</p>	<p>Part: strengthening of sub-catchment scale management, adaptive management and good management practices and the use of input loads across these policies Allow</p> <p>Part: relationship between an enterprise, a sub catchment management plan and a consent Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.10	SUBMISSION POINT ID: PC1-11367
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.6; 3.11.5.7	SUBMISSION POINT ID: PC1-11378; PC1-11379
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports the strengthening of sub-catchment scale management, adaptive management and good management practices within the rules, and therefore supports Wairakei Pastoral Limited's proposals to this extent. However, we consider that sub catchment management plans should be prepared at the sub-catchment community level, with technical input by Waikato Regional Council. We reserve our position on the relationship between an enterprise, a sub catchment management plan and a consent. For specific catchments where an entity covers a large part of it, that entity's Farm Environment Plan may in effect almost be a sub catchment management plan. However, in most sub catchments, we envisage a sub catchment management plan that identifies the issues, loads, monitoring	Part Allow Part Disallow

<p>data and requirements and gives guidance on appropriate management practices and mitigations. Under this, there will be permitted or consented activities with Farm Environment Plans, either as individual properties/enterprises, or under a Certified Industry Scheme.</p>	
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 1	SUBMISSION POINT ID: PC1-12546
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Part; "AMEND Schedule 1 to consistently refer to a 'property or enterprise' throughout." Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Table 3.11-1	SUBMISSION POINT ID: PC1-11391
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Part; "AMEND PPC1 to use consistent cross-referencing to the freshwater objectives in the National Policy Statement for Freshwater 2014.

	<p>AND AMEND Table 3.11-1 to include a new first column which identifies and links the sub-catchment name with the relevant sub-catchment number as shown in Appendix C of the submission.</p> <p>AND AMEND to substitute the short-term and long-term numerical freshwater objectives for sub-catchments 56, 58, 59, 62, 65, 66B, 72, 73 and 74 with the alternative freshwater objectives in Appendix C of the submission.”</p> <p><i>Allow</i></p>
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairakei Pastoral Ltd	ORIGINAL SUBMITTER ID: 74095
ADDRESS OF ORIGINAL SUBMITTER: PO Box 75-945, Manurewa 2243	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Additions to Glossary of Terms	SUBMISSION POINT ID: PC1-11400
Do you support or oppose the submission? Support in part Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Re addition of definition for sub catchment management plan: Same reasons as those given by the submitter.</p> <p>Re new Schedule 2: Miraka strongly supports a sub-catchment scale approach for the identification of water quality issues and consequent management of such issues. We therefore support Wairakei Pastoral Limited's proposal to have a schedule of requirements for a sub-catchment management plan, and much of the content.</p> <p>However, we consider that the preparation of such plans should be at the sub-catchment community level, with technical input by Waikato Regional Council. We reserve our position on the relationship between an enterprise, a sub-catchment management plan and a consent. While this may be appropriate in certain sub-catchments, in many others a single entity-consent approach may not be appropriate and therefore the sub catchment management plan requirements should not be tied to this. We see the sub-catchment management plan as being an overarching document for the sub catchment, under which various permitted or consented activities (individual or under a Certified Industry Scheme) may operate, utilising a Farm Environment Plan approach.</p> <p>Further, we seek the development of sub catchment management plans for all sub catchments to guide ongoing activities, and not only in the situation where a land use change is sought.</p>	<p>Part; "AND ADD a NEW definition for 'sub-catchment management plan' to read: <u>"Sub-catchment management plan means a plan for the relevant part of a PPC1 sub-catchment (Map 3.11-2) prepared following a collaborative process involving iwi and other stakeholders, that identifies water quality issues and principles and management actions (including Decision Support Tools) required to manage these issues."</u> <i>Allow, or similar wording to ensure it is a community sub-catchment management plan</i></p> <p>Part: AND ADD 3 NEW schedules (as set out in Appendix B of the submission) to give effect to the above definitions:</p> <p>AND ADD a NEW Schedule 2 to read: <u>"Schedule 2: Requirements for a Sub-catchment management plan</u> <u>The purpose of a Sub-catchment management plan is to identify the current water quality in a sub-catchment (within Table 3.11-2), whether water quality is required to be maintained, protected or restored, and methods to achieve the relevant outcome required.</u> <u>In the Waikato and Waipā River Catchments, water quality outcomes and values have been determined through the Vision and Strategy.</u> <u>Sub-catchment-management plans will take a proactive, prioritised and integrated 'whole of sub-catchment' approach to managing each sub-catchment's land and water, identify specific issues and include actions to:</u></p>

Re new Schedule 3:

Miraka supports an adaptive management approach for the same reasons as those given by the submitter

Re new Schedule 4:

Same reasons as those given by the submitter

Miraka strongly believes that the application of Good Management Practice should be a requirement for all farming activities. We support Wairakei Pastoral Limited's proposal for a Schedule of Farm Mitigations or Good Management Practices and its suggested content (which requires industry consultation and agreement), but subject to the understanding and agreement that the most appropriate and effective practices may differ depending on the biophysical and farm system factors at both an enterprise and sub-catchment scale. All farms must apply Good Management Practices, but the specific practices may differ.

- Maintain or improve water quality;
- Conserve soil;
- Restore and protect important biodiversity habitats;
- Meet iwi aspirations for the Waikato River.

Sub-catchment management plans are prepared by an enterprise and are intended to provide clear guidance including management actions for the preparation of **Farm Environment Plans** (as required by Schedule 1).

A Sub-catchment management plan shall as a minimum:

- a) Identify the current water quality and water quality issues at a sub-catchment level that need to be managed to achieve the Objectives to be met;
- b) Provide details of any Decision Support Tools required to measure, model, and predict discharges from individual properties and enterprises within the sub-catchment, and how they can be related to the Table 3.11-1 freshwater objectives;
- c) Establish the principles for allocation (consistent with Policy 7) of an input load based nutrient cap at the refined sub-catchment level through the development of a relationship between land use suitability and the Table 3.11-1 water quality attribute targets for the sub-catchment;
- d) Provide for the management of nitrogen, phosphorus, sediment and microbial pathogen losses in the sub-catchment through mitigation measures to be undertaken by the consent holder to ensure that the actual or potential environmental effects of carrying out the allowed land use change (including any effects from subsequent farming activities) meet Objectives 1 and 3;
- e) Provide direction for the preparation and independent auditing of Farm Environment Plans to ensure farming activities operate at Good Management Practice (**GMP**) levels or better and other mitigation options;
- f) Provide an adaptive management approach (consistent with Schedule 3) to monitor and respond to actual or potential adverse effects of the land use change on the environment (including any effects from subsequent farming activities) and associated diffuse discharges;

g) Provide independent validation for the predictive performance and accuracy of any Decision Support Tool;

h) Provide direction for how any proposed land use changes are to be carried out in stages;

i) Include a robust monitoring programme (real-time, reporting of contaminant losses in a suitable digital format) designed to monitor the actual or potential environmental effects of carrying out the land use change (including any effects from subsequent farming activities) over a period of 25 years from the grant of consent;

j) Require annual monitoring and mitigation reports to be prepared by the consent holder and submitted to the Waikato Regional Council (in accordance with consent conditions preferred by the enterprise) within the period of three months after each anniversary of the grant of consent"

Allow the majority of the text above; disallow the text blocked in grey

Part;

ADD a NEW Schedule 3 to read:

"Schedule 3: Adaptive Management Approach

The purpose of an Adaptive Management Approach is to allow a flexible approach to the management of natural resources and to apply a learning cycle for each decision-making step. Adaptive management is underpinned by predictive modelling to test a range of hypothetical options for their relative impacts on the current state.

A management process is then informed by the stepwise learning from changes in state modelling against the predicted outcomes. This allows informed or guided decisions rather than random exercises. Adaptive management is often required when complex ecological systems are being managed and management decisions cannot wait for final research results.

To achieve the Vision and Strategy for maintaining, protecting and restoring the health and wellbeing of the Waikato River (through Objectives 1 and 3), management at a sub-catchment level is required. To meaningfully reduce input loads and meet the water quality targets, a range of mitigation actions will be required, reinforced where appropriate by Decision Support Tools. An Adaptive Management Approach is required

to ensure that mitigations and predictions do not lead to unintended consequences for the environment and communities, or delay vital actions from being taken to achieve the objectives. Such consequences may lead to financial costs for a community and a loss of confidence in mitigation actions. However, because predictive analysis is carried out by modelling, an Adaptive Management Approach will need to allow for adjustment of the speed at which mitigation tools are used in terms of their actual effect on water bodies. Thus depending on the available data, properties and enterprises may need to adapt their programme by accelerating or decelerating the use of mitigation depending on the monitoring results. Consent conditions should therefore provide the flexibility to achieve these outcomes. When preparing a Sub-catchment management plan (or Farm Environmental Plan) the plan should include the following features of adaptive management (where appropriate):

- a) The existing environment is established by robust baseline monitoring;
- b) The extent of the environmental risk (including the gravity of the consequences if the risk is realised) is tested by the Decision Support Tools;
- c) Effects that might arise can be remedied before they become irreversible;
- d) The plan(s) provide for effective monitoring of adverse effects using appropriate indicators;
- e) Thresholds are set to trigger remedial action(s) before the effects become overly damaging;
- f) Where advanced mitigation is undertaken, it is staged and plans require certain criteria to be met before the next stage can proceed;
- g) Where land use change is undertaken, it is staged and any management plans require certain criteria to be met before the next stage can proceed;
- and
- h) There is a real ability to remove all or some of the land development that has occurred if the monitoring results demonstrate criteria are not met."

Allow

Part;

ADD a NEW Schedule 4 to read:

"Schedule 4: Farm Mitigations for Catchment Management

The objective is to get every farm performing at Good Management Practice (GMP) level as a starting point. It is appropriate that GMP is implemented, and these are considered necessary before any additional mitigation can be provided.

The mitigation tools should be chosen by the relevant property or enterprise as to which is both practical and economic as part of either a Farm Environmental Plan or a Sub-catchment management plan.

The scheduled mitigations can be used in limiting the amount of each of the four key contaminants (in the input loads for land use management) from becoming discharges to groundwater and water bodies in the Waikato River system.

Mitigation of effects to water bodies of the four key contaminants from agricultural land have been divided based on whether they are modelled in OVERSEER or APSIM or SPASMO.

Many management and mitigation practices serve the benefit of reducing effects for a range of contaminants, and may be included in more than one table. For example, riparian planting can reduce sediment, phosphorus and pathogens from entering water bodies.

The summary tables below identify management and mitigation tools, and indicate if they can be incorporated into OVERSEER, or APSIM or SPASMO as appropriate.

Microbial Pathogens

The objective of limiting the numbers of pathogens directly affecting the water is to reduce the number of animals depositing urine and faeces into water bodies either directly or indirectly by across ground transfer.

Phosphorus (P)

The objective of limiting the amount of P is to limit the amount which is left on the surface of the soil which is then available to be washed directly into the water bodies and to limit the amount of soil which can be washed directly into the water bodies carrying P with it.

Nitrogen (N)

	<p><u>Nitrogen is transported from below the root zone through the soil to water bodies. The objective of limiting the amount of leaching through the soil profile is to limit the amount of N within the root zone that is then able to be washed through by excess moisture. The amount of excess N within the root zone comes from the application of N fertilisers and from the high concentration of N in the urine of cattle. The prime time when leaching occurs is during the winter months when the soil profile is full of moisture. Therefore, some of the following mitigation techniques are aimed at reducing the total amount of N in the soil while some are designed to reduce the amount of N in the soil during the late autumn and winter period.</u></p> <p><u>Sediment</u></p> <p><u>Sediment carries with it phosphorus and other compounds that can have a negative effect on aquatic life and appearance (colour/clarity) of the water body. The objective of applying good management practice is to reduce the amount of sediment entering waterways that will have a negative effect on aquatic life, appearance, and recreational use."</u></p> <p>REFER to Appendix B of the submission for the accompanying tables which describe mitigation actions to manage each contaminant.</p> <p>AND MAKE alternative, consequential or further relief that may be required to promote sustainable management or give effect to the submission.</p> <p><i>Allow</i></p>
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Wairarapa Moana Incorporation; ID 72480; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11	SUBMISSION POINT ID: PC1-2073
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Map 3.11-1	SUBMISSION POINT ID: PC1-2065
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 1	SUBMISSION POINT ID: PC1-2076
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 3	SUBMISSION POINT ID: PC1-2079
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 1	SUBMISSION POINT ID: PC1-2084
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Note, our position now is that ALL farming activities be required to apply Good Management Practices, and that Best Management Practices be included in Farm Environment Plans as appropriate to the sub-catchment issue(s) and severity.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: PC1-2087
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 4	SUBMISSION POINT ID: PC1-2102
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: PC1-2112
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 9	SUBMISSION POINT ID: PC1-2115
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 16	SUBMISSION POINT ID: PC1-2122
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.3	SUBMISSION POINT ID: PC1-2125
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Our position is that there should be a Schedule of Good Management Practices that ALL farming activities are required to apply, and Guidelines for Best Management Practices and mitigations that can be included in Farm Environment Plans as appropriate to the risk, farming practice, land type and other biophysical factors.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.7	SUBMISSION POINT ID: PC1-2126
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Part; "DELETE the reference to land suitability in Method 3.11.4.7" Modified wording: AND AMEND to include a clause 'vi' under (b) that reads as follows: " <u>The effects the hydro system has on water quality and water monitoring readings.</u> " Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.3	SUBMISSION POINT ID: PC-2141
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.4	SUBMISSION POINT ID: PC1-2142
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule B – Nitrogen Reference Point	SUBMISSION POINT ID: PC1-2146
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 1	SUBMISSION POINT ID: PC1-2148
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 1	SUBMISSION POINT ID: PC1-12548
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Our position is that there should be a Schedule of Good Management Practices that ALL farming activities are required to apply, and Guidelines for Best Management Practices and mitigations that can be included in Farm Environment Plans as appropriate to the risk, farming practice, land type and other biophysical factors.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.6	SUBMISSION POINT ID: PC1-2155
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Map 3.11-2	SUBMISSION POINT ID: PC1-2071
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Wairarapa Moana Incorporation	ORIGINAL SUBMITTER ID: 72480
ADDRESS OF ORIGINAL SUBMITTER: C/- Jude Addenbrook, 271 Mystery Creek Road, Ohaupo 3881	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition – 75th percentile nitrogen leaching value	SUBMISSION POINT ID: PC1-2158
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

Waitomo District Council; ID 73688; PC1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waitomo District Council	ORIGINAL SUBMITTER ID: 73688
ADDRESS OF ORIGINAL SUBMITTER: PO Box 404, Queen Street, Te Kuiti 3941	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: PC1-10298
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	<p>Part; “AND resource the development of sub-catchment management plans through funding and staff to focus effort in the areas where the benefits are greatest AND AMEND to employ robust sub-catchment planning and management and place more emphasis on Farm Environment Plans to manage nitrogen.”</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waitomo District Council	ORIGINAL SUBMITTER ID: 73688
ADDRESS OF ORIGINAL SUBMITTER: PO Box 404, Queen Street, Te Kuiti 3941	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.3	SUBMISSION POINT ID: PC1-11105
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter, in particular regarding the inequities of the NRP approach and the inaccuracies of Overseer, which was not designed to produce a regulatory benchmark:	<p>Part; “AMEND Policies nitrogen discharge provisions to take account of sub-catchment differences</p>

<p>“Much of the focus of PC1 centres on limiting and managing nitrogen discharges. This emphasis seems to be driven largely by the availability of data on nitrogen, compared to the availability of data on other contaminants. This approach does not take into account significant differences in sub-catchment environmental characteristics.”...</p> <p>“Council does not consider that applying a ‘one size fits all’ rule to nitrogen loss by way of a Nitrogen Reference Point (NRP) is an appropriate approach for Waitomo District. Council further considers that applying the same approach to contaminant loss across the whole Waikato-Waipā catchment does not take proper or appropriate account of sub-catchment differences. As such, Council considers this approach to be inequitable...”</p> <p>“Council believes that applying a ‘one size fits all’ approach by way of a NRP on a catchment-wide basis, fails to take into account the significant differences that apply across the catchment. “</p> <p>“A more effective and refined approach would be to employ sub-catchment planning and management, and alongside that, focus on implementing robust Farm Environment Plans (FEPs). Council considers that FEPs could be used to identify and mitigate high risk situations. Where the FEP indicates that the risk cannot be mitigated, the rules need to ensure that the consenting process appropriately limits the adverse environmental effects. “</p> <p>“The Council also opposes the principle of using modelled numerical values of nitrogen discharges via the Overseer model to determine resource consent status and compliance with standards. It is understood that Overseer was designed as an assessment tool rather than as a legally enforceable standard. A numerical model is subject to many unknowns beyond the control of users and beyond the control of WRC. There is excessive reliance on the NRP calculated via Overseer. Because Overseer determines numerical standards to be met for ongoing compliance with the NRP, it will need to be re-run for any land use change, and possibly more frequently to demonstrate compliance. This creates uncertainty and excessive compliance costs. The costs, benefits and risks of using Overseer in this way need to be considered in more detail. “</p>	<p>AND REPLACE the Nitrogen Reference Point catchment-wide approach with a sub-catchment planning and management alongside the implementation of robust Farm Environment Plans</p> <p>AND REMOVE the use of modelled (OVERSEER Model) numerical values of nitrogen discharges to determine resource consent status and compliance with standards</p> <p>AND AMEND to consider the risks, cost and benefits of Overseer in more detail</p> <p>AND AMEND to replace the nitrogen management provisions with an emphasis on Farm Environment Plans.”</p> <p>Allow</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waitomo District Council	ORIGINAL SUBMITTER ID: 73688
ADDRESS OF ORIGINAL SUBMITTER: PO Box 404, Queen Street, Te Kuiti 3941	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 6; Policy 10; Policy 11; Policy 12	SUBMISSION POINT ID: PC1-10317; PC1-10318; PC1-10319; PC1-10320
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p> <p>Policies 10-12 assume that certain point source discharges can have some adverse effect and may increase, but Policy 6 does not make the same allowance for diffuse discharges. Policy 6 states that applications that demonstrate an increase in diffuse discharge of the listed contaminants will “generally not be granted”. It is not clear why these differentiations have been made between point source and diffuse discharges, when from an effects-based perspective, they apply to the same contaminants discharging into the same receiving environment.</p>	<p>Part;</p> <p>AMEND to address the policy disconnect between Policies 10 to 12 and Policy 6 [Policies 10 to 12 assume that certain discharges can have an adverse effect to a point and may increase, but Policy 6 does not make the same allowance for diffuse discharges].</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waitomo District Council	ORIGINAL SUBMITTER ID: 73688
ADDRESS OF ORIGINAL SUBMITTER: PO Box 404, Queen Street, Te Kuiti 3941	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 9; 3.11.4.5	SUBMISSION POINT ID: PC1-10323; PC1-10322
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	<p>Part; “AMEND Policy 9 and Method 3.11.4.5 to make the development of sub-catchment plans a high priority implementation item OR ADD a NEW sub-catchment management policy to make the development of sub-catchment plans a high priority implementation item ... AND AMEND to promote sub-catchment plans that deliver broader benefits than individual property compliance.”</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waitomo District Council	ORIGINAL SUBMITTER ID: 73688
ADDRESS OF ORIGINAL SUBMITTER: PO Box 404, Queen Street, Te Kuiti 3941	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5; 3.11.5.2; 3.11.5.3; 3.11.5.4; 3.11.5.5; 3.11.5.6	SUBMISSION POINT ID: PC1-10312; PC1-10328; PC1-10330; PC1-10332; PC1-10333; PC1-10334
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter, in particular: “The NRP is a property-specific numerical value derived using the software package Overseer which is used to estimate nutrient losses. However it is not suitable as a Plan standard or condition to be complied with because it is subject to change as a result of external factors. These include changes in the Overseer model as it is updated over time and its sensitivity to different data inputs. As a result it does not meet the test of certainty required of a permitted activity rule. Clause 30 of Schedule 1 to the RMA sets out the requirements for ‘written material’ to be included in a Plan. Although Overseer is not ‘written material’ a similar approach can be applied, and again it would not meet the relevant test. The technical document ‘Using Overseer in Regulation’, also recommends against using it for permitted activity thresholds...”</p>	<p>Part; “AMEND the provisions specifying the Nitrogen Reference Point be calculated and not exceeded, and instead use the Nitrogen Reference Point as part of a Farm Environment Plan to inform mitigation measures.”</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waitomo District Council	ORIGINAL SUBMITTER ID: 73688
ADDRESS OF ORIGINAL SUBMITTER: PO Box 404, Queen Street, Te Kuiti 3941	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.4; 3.11.5.5; 3.11.5.7	SUBMISSION POINT ID: PC1-10332; PC1-10333; PC1-10334; PC1-10335
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	<p>Part; “AND AMEND to include additional matters of control, standards and terms and matters of discretion providing for offset mitigation, generally as outlined in Policy 11. The matters should specify the offset: is for the same contaminant; occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit; and remains in place for the duration of the consent and is secured by consent condition.”</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waitomo District Council	ORIGINAL SUBMITTER ID: 73688
ADDRESS OF ORIGINAL SUBMITTER: PO Box 404, Queen Street, Te Kuiti 3941	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.7	SUBMISSION POINT ID: PC1-10335
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	<p>Part; “AND REPLACE with a rule that specifies that the land use changes specified in it are a discretionary activity with specific criteria to measure applications against including whether the loss of contaminants will be the same or lower than existing land use. AND AMEND to take an effects-based approach, allowing intensification where contaminant discharges are maintained, reduced or offset AND AMEND to explain how Rule 3.11.5.7 is to be administered where there is a mix of varied land use changes within the same property or enterprise.”</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waitomo District Council	ORIGINAL SUBMITTER ID: 73688
ADDRESS OF ORIGINAL SUBMITTER: PO Box 404, Queen Street, Te Kuiti 3941	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule B – Nitrogen Reference Point	SUBMISSION POINT ID: PC1-10341
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter in its preamble and submission point summary, in regarding the inequities of the NRP approach and the inaccuracies of Overseer, which was not designed to produce a regulatory benchmark:</p> <p>“Much of the focus of PC1 centres on limiting and managing nitrogen discharges. This emphasis seems to be driven largely by the availability of data on nitrogen, compared to the availability of data on other contaminants. This approach does not take into account significant differences in sub-catchment environmental characteristics.”...</p> <p>“Council does not consider that applying a ‘one size fits all’ rule to nitrogen loss by way of a Nitrogen Reference Point (NRP) is an appropriate approach for Waitomo District. Council further considers that applying the same approach to contaminant loss across the whole Waikato-Waipā catchment does not take proper or appropriate account of sub-catchment differences. As such, Council considers this approach to be inequitable...”</p> <p>“Council believes that applying a ‘one size fits all’ approach by way of a NRP on a catchment-wide basis, fails to take into account the significant differences that apply across the catchment. “</p> <p>“A more effective and refined approach would be to employ sub-catchment planning and management, and alongside that, focus on implementing robust Farm Environment Plans (FEPs). Council considers that FEPs could be used to identify and mitigate high risk situations. Where the FEP indicates that the risk cannot be mitigated, the rules need to ensure that the consenting process appropriately limits the adverse environmental effects. “</p>	<p>Part;</p> <p>“AMEND Schedule B discharge provisions to take account of sub-catchment differences</p> <p>AND REPLACE the Nitrogen Reference Point catchment-wide approach with a sub-catchment planning and management alongside the implementation of robust Farm Environment Plans.</p> <p>AND REMOVE the use of modelled (the OVERSEER Model) numerical values of nitrogen discharges to determine resource consent status and compliance with standards</p> <p>AND CONSIDER the risks cost and benefits of Overseer in more detail</p> <p>AND AMEND to replace the nitrogen management provisions with an emphasis on Farm Environment Plans and robust sub-catchment planning and management.”</p> <p>Allow</p>

<p>“The Council also opposes the principle of using modelled numerical values of nitrogen discharges via the Overseer model to determine resource consent status and compliance with standards. It is understood that Overseer was designed as an assessment tool rather than as a legally enforceable standard. A numerical model is subject to many unknowns beyond the control of users and beyond the control of WRC. There is excessive reliance on the NRP calculated via Overseer. Because Overseer determines numerical standards to be met for ongoing compliance with the NRP, it will need to be re-run for any land use change, and possibly more frequently to demonstrate compliance. This creates uncertainty and excessive compliance costs. The costs, benefits and risks of using Overseer in this way need to be considered in more detail. “</p>	
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waitomo District Council	ORIGINAL SUBMITTER ID: 73688
ADDRESS OF ORIGINAL SUBMITTER: PO Box 404, Queen Street, Te Kuiti 3941	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule C – Stock exclusion	SUBMISSION POINT ID: PC1-10846
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter, in terms of being aligned with the NPS for Freshwater Management. Miraka reserves its position in relation to the specific mechanism to achieve alignment and the wording.	Part: (replacement of Schedule C with cross references to the NPS for Freshwater Management) Allow

AgFirst Waikato (2016) Ltd; ID 81854; V1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: AgFirst Waikato (2016) Ltd	ORIGINAL SUBMITTER ID: 81854
ADDRESS OF ORIGINAL SUBMITTER: PO Box 9078, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: V1PC1-39
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
The determination of long-term nutrient allocation frameworks requires a full Schedule 1 process. It is pre-emptive to indicate a preferred framework at this point, or to implement a trading scheme.	Whole Disallow

Auckland/Waikato Fish & Game and Eastern Region Fish & Game; ID 74085; V1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Auckland/Waikato Fish and Game and Eastern Region Fish and Game	ORIGINAL SUBMITTER ID: 74085
ADDRESS OF ORIGINAL SUBMITTER: 156 Brymer Road, RD 9, Hamilton 3289	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: V1PC1-1548
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
As well as making original submission points on the Variation, Auckland/Waikato Fish and Game and Eastern Region Fish and Game (Fish and Game) has re-asserted its original submission points on PPC1 in its submission on the Variation. Rather than repeat our support or opposition to those points, we note that all points supported or opposed by us in relation to Fish and Game's submission on PPC1 are similarly supported and opposed in relation to their submission on the Variation. Any points not specifically covered are opposed in their entirety.	<p>Part</p> <p>All of Fish and Game's submission points that we have supported or opposed in relation to PPC1 (note that the Submission Point IDs will differ, but the Provisions are constant).</p> <p><i>Allow and Disallow as per our Further Submissions to Fish and Game's submission on PPC1</i></p>

Beef + Lamb New Zealand Limited; ID 73369; V1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General; General; General; 3.11.3	SUBMISSION POINT ID: V1PC1-566; V1PC1-1730; V1PC1-1732; V1PC1-1648
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>This Submission Point seeks to apply submission points 1-47 (numbering in the submitter's original PPC1 submission) and the specific submission points under section 3 of the submitter's PPC1 submission and the relief sought to V1. Miraka supports or opposes on the same points (whole or part) and for the same reasons as is given in Miraka's further submission on Beef+Lamb's submission on PPC1.</p> <p>Further, wherever Beef+Lamb's submission on Variation 1 seeks to "APPLY decision to V1 requested in accordance with the submitter's PPC1 submission PC1-xxxx", Miraka supports or opposes on the same points (whole or part) and for the same reasons as is given in Miraka's further submission on Beef+Lamb's submission on PPC1.</p>	<p>Part Allow</p> <p>Part Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: V1PC1-1703
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: V1PC1-1704
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

	<p>AND AMEND so that N discharge/leaching standards/allocations are established based not on existing use and discharge profiles, but on the underlying natural capacity of soils and within the assimilative capacity of water.</p> <p>AND AMEND so that allocation methods achieve the limits and targets set by proposed V1 and PPC1 and the Objectives of the plan.</p> <p>AND AMEND PPC1 and V1 to apply Land Use Capability (LUC) as the allocation approach rather than grandparenting low leaching land uses to their NRP.</p> <p>AND AMEND so that nitrogen loads are allocated within (sub) catchments in such a way that there is an equitable allocation of total catchment nitrogen load to all users/activities who may wish to use the available resource.</p> <p>AND AMEND to establish a nutrient transfer regime for nutrient user groups within sub-catchments, where catchment loads and limits have been established but only where any allocation methods are not based on current discharges (NRP) or land use. Transfer regimes are to enable nitrogen loss reductions to be achieved at least cost and to enable and encourage maximum efficiency and flexibility of resource use and to optimise economic benefits. Nutrient transfer systems must meet the following conditions:</p> <ul style="list-style-type: none"> • The initial allocation system meets all of the allocation principles; • Only occurs within a sub-catchment or watershed and only within a nutrient user/Catchment Collective Groups; • The transferable portion of the resource (e.g. nitrogen) only pertains to the load which achieves the desired environmental outcomes; and • Result in improved economic outcomes and land use optimisation.” <p><i>Disallow</i></p>
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: V1PC1-1708
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka opposes a sector-specific approach to the provisions, such as recognising and providing for drystock sector farming operations specifically. Provisions should be relative to discharges and their effects on the environment.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.2	SUBMISSION POINT ID: V1PC1-1715
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
As per our further submission on the submitter's PPC1 submission point PC1-11150	Allow and Disallow as per our further submission on the submitter's PPC1 submission point PC1-11150 with regard to intent and general content (even where specific wording differs)

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule C – Stock exclusion	SUBMISSION POINT ID: V1PC1-1713
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited	ORIGINAL SUBMITTER ID: 73369
ADDRESS OF ORIGINAL SUBMITTER: 1/585 Wairakei Road, Christchurch 8545, Canterbury	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11-1	SUBMISSION POINT ID: V1PC1-675, 1658
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka reserves its position on the specific wording	Part Allow

Department of Conservation; ID 71759; V1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: V1PC1-1698
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>The determination of allocation regimes should be subject to a full Schedule 1 process. The focus of PPC1 is on short-term actions and improvements, and it would be inequitable to impose long term frameworks now without full process.</p>	<p>Part; “AND AMEND PPC1 to implement greater changes to the management of contaminant discharges in the short-term, through an allocation regime that recognises land type and achieves a greater short-term improvement in water quality. AND, with respect to all Freshwater Management Units, AMEND PPC1 to provide for an allocation regime that only permits the discharge of contaminants up to a level that ensures the limits and objectives for the freshwater management unit can be achieved. Where this level of contaminants has already been exceeded, the targets needs to be set with clear implementation methods to achieve them. The regime needs to take account the slope, soil type, drainage and geology of the land. AND AMEND PPC1 to establish an efficient allocation regime as follows:</p> <ul style="list-style-type: none"> • State the maximum catchment load of contaminants. • Allocate the maximum catchment load among land uses using a Land Use Capability (LUC) based approach whereby land type including slope, soil type, drainage and geology is the key determinant. • Seek to ensure that activities which would cause the maximum catchment load to be exceeded are avoided. • Seek to ensure that in catchments that are already over-allocated, PPC1 establishes methods to phase out over-allocation over time.” <p>Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Department of Conservation	ORIGINAL SUBMITTER ID: 71759
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3072, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Entire submission	SUBMISSION POINT ID: Entire submission
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka opposes the Department of Conservation’s submission on Variation 1 in its entirety. We consider many of the submission points to be too general to ensure clear interpretation and we reserve our right to comment as the submitter reveals detail.	Whole Disallow

Federated Farmers of New Zealand; ID 74191; V1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: V1PC1-778
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter Miraka reserves its position on the specific wording	Part: concept Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Area covered by Chapter 3.11	SUBMISSION POINT ID: V1PC1-93
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter, and in our original submission. Miraka opposes the current FMU scale and considers that the unit should be of a scale that allows similar soil, geophysical, climate and other relevant characteristics such that any relativity of discharge values reflect farm practices that can be managed and not the inherited features that cannot. Miraka continues to oppose the 75 th percentile nitrogen leaching approach, and considers that NRPs should be used as a reference and not as a	Part; "AND AMEND the third paragraph to read: "FMUs enable monitoring of progress towards meeting targets and limits. <u>This will also occur at a sub-catchment level, with the sub-catchment identified in Map 3.11-2.</u> " AND AMEND 'Area covered by Chapter 3.11' to clarify the intention of FMUs and sub-catchments and how this gives effect to the NPSFM. AND AMEND to clarify the spatial unit for freshwater accounting and monitoring and ensure that it is a reasonable scale that provides for an indication of water quality and management issues."

<p>benchmark or the basis for allocation. If, however, the 75th percentile approach is retained, then Miraka supports the changes sought in by Federated Farmers in Submission Point V1PC1-93.</p>	<p>Allow Part; If the FMUs are used to calculate the dairy nitrogen curve as the basis for requiring those above the 75th percentile to reduce THEN AMEND the FMUs so that similar sub-catchments are aggregated. OR AMEND the FMUs to split the Upper Waikato FMU into two or more FMUs with similar geophysical and geographical features. OR AMEND the policy and rule framework to ensure that those have to reduce nitrogen are those with the highest discharges for the same biophysical and/or climate characteristics.” Allow with reservation</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 1 and Reasons for adopting Objective 1	SUBMISSION POINT ID: V1PC1-122 and 156
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 3 and Reasons for adopting Objective 3	SUBMISSION POINT ID: V1PC1-129 and 158
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 4 and Reasons for adopting Objective 4	SUBMISSION POINT ID: V1PC1-143 and 159
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 5 and Reasons for adopting Objective 5	SUBMISSION POINT ID: V1PC1-147 and 160
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the retention of Objective 5, including that new impediments to the flexibility of the use of tangata whenua ancestral lands are minimised, and agrees with the PPC1 observations on historic impediments and the continuation of some impediments or their effects in Reasons for adopting Objective 5.</p> <p>We therefore oppose Federated Farmers' attempts to remove these or any part these. We disagree with their position that flexibility for tangata whenua ancestral lands introduces inequity. Rather, it is a step to balance the historic and ongoing inequities that have been imposed on Maori land.</p>	<p>Whole Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.3	SUBMISSION POINT ID: V1PC1-172
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the inclusion of a policy on Farm Environment Plans, for the reasons given by the submitter.</p> <p>Miraka reserves its position on the specific wording.</p>	<p>Part – concept of including policy on FEPs Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.3	SUBMISSION POINT ID: V1PC1-175
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports the inclusion of a policy on Review and Amendment of Certified Farm Environment Plans, for the reasons given by the submitter. Miraka reserves its position on the specific wording and in particular seeks the insertion of clauses to ensure appropriate rigour and auditing of such reviews to provide assurance for the wider community.	Part – concept of including policy on Review and Amendment of Certified FEPs Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.3	SUBMISSION POINT ID: V1PC1-240
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports the inclusion of a policy on Additional considerations for diffuse discharges, for the reasons given by the submitter. We also support clauses (a) and (d). Miraka reserves its position on the specific wording and opposes clause (b) as not being effects-based and potentially being prejudicial to a specific sector(s).	Part; “ADD a NEW policy to read: ' <u>Policy 12 A: Additional considerations for diffuse discharges in relation to water quality targets</u> <u>Consider the contribution made by a diffuse discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads and the impact of that contribution on the likely achievement of the short-term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision and Strategy and values^ referred to in Objective 1, taking into account:</u>

	<p>a. <u>the characteristics of the sub-catchment within which the subject farm enterprise is located as set out in the Catchment Profile and any sub-catchment management plan (including load reductions achieved through whole of sub-catchment actions); and</u></p> <p>...</p> <p>d. <u>investment in past on farm and edge of field contaminant mitigations including technology upgrades to model, monitor and reduce the discharge of nitrogen, phosphorus, sediment and microbial pathogens where those mitigations are already achieving a high level of contaminant reduction.'</u></p> <p>Allow</p> <p>Part;</p> <p>b. <u>the relative contribution of the industry sector within which the farming enterprise belongs to the likely achievement of the short-term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision and Strategy and values^ in Objective 1; and</u></p> <p>c. <u>the resources reasonably available to the farm enterprise; and''</u></p> <p>Disallow</p>
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 1	SUBMISSION POINT ID: V1PC1-162
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter regarding including point source discharges, with amendments and additions to clauses a-c to be inclusive of point source discharges.	<p>Part; “AMEND Policy 1 to read: 'Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens Manage and require reductions in sub-catchment <u>wide diffuse and point source</u> discharges of nitrogen, phosphorus, sediment, and microbial pathogens <u>to assist with achieving the short-term water quality attribute targets in Table 3.11-1</u>”</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: V1PC1-164
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka maintains the position in its original submission that the degree of reductions be proportionate to the difference between current practices and the application of Best Management Practices (those not currently applying mitigations expected to make greater reductions). The most efficient way of doing this would be to replace the nitrogen leaching	<p>Part; “AND AMEND Policy 2(d) to read: 'i. the amount of <u>the</u> current discharge (those discharging more are <u>may be</u> expected to make greater reductions) and proportionate to ...”</p>

<p>approach with a nitrogen surplus approach. This would avoid both the geophysical bias effect and the main issues with Overseer inaccuracy, and would enable a focus on actual management practices, which can be changed in the short term.</p> <p>An alternative approach that would go some way to reducing the inequities of applying a FMU-based NRP benchmark would to be compare like with like (i.e. homogeneity of geophysical and climate factors within a sub catchment or modified FMU). At the very least, there should be consideration of the characteristics of the sub catchment, as per the decision sought by Federated Farmers for Policy 2(d)(iii).</p>	<p>and <u>iii. the characteristics of the sub-catchment within which the subject farm enterprise is located and the scale of water quality improvement required in the sub-catchment; and”</u></p> <p><i>Allow if Miraka’s preferred relief is not obtained</i></p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 4	SUBMISSION POINT ID: V1PC1-188
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p> <p>Miraka also sought an amendment to Policy 4, and continues to seek that.</p> <p>Our support of Federated Farmers’ decision sought is in addition to our own.</p>	<p><i>Whole</i></p> <p><i>Allow</i></p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 5	SUBMISSION POINT ID: V1PC1-193
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 6	SUBMISSION POINT ID: V1PC1-194
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports the provision of a consenting pathway the development of tangata whenua ancestral lands (including land use change), and supports some flexibility for intensification or land use change where contaminants that are not of concern for that specific sub catchment may increase slightly provided the contaminants of concern do not increase. We oppose the wording in clauses (a) and (b) as not providing sufficient strength to meet water quality objectives, and we oppose (c) as it appears to lay a different foundation for one contaminant relative to the others.	Part; provision of consenting pathways Allow Part; Clauses (a), (b) and (c) Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: V1PC1-224
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter, and in our original submission.</p> <p>Miraka agrees with Federated Farmers in its concern about the signalling of an allocation approach at this stage or pre-determining the way forward.</p> <p>Miraka also supports Federated Farmers opposition to the use of the Nitrogen Reference Point as a de facto allocation mechanism.</p>	<p>Whole Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 8	SUBMISSION POINT ID: V1PC1-231
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka maintains its original position that sub-catchments should not be prioritised with respect water quality improvement implementation, as the required change in water quality in the short term should be borne by all dischargers of contaminants across the whole region. We also maintain our original opposition to the 75th percentile approach, for the reasons previously given around application of good management practices across the board.</p>	<p>Part; re-prioritisation of sub catchments Allow</p>

<p>We did, however, note that some prioritisation of sub catchments may be needed in relation to allocation of council staff resources, planning and funding. With respect to this prioritisation, we support Federated Farmers' suggested methodology for re-prioritisation of sub catchments, including the focus on 10-year targets.</p>	
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 9	SUBMISSION POINT ID: V1PC1-234
Do you support or oppose the submission? Support in part and oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter. Miraka supports the intent of this submission point, but considers it could be achieved by simply deleting the word 'farming' from 'farming enterprises' in conjunction with the deletion of the word 'diffuse'.</p>	<p>Part; AMEND Policy 9(d) to read: 'Allowing, where multiple enterprises contribute to a mitigation, for the resultants reduction in diffuse discharges to be apportioned to each enterprise in accordance with...' Allow</p> <p>Part; "AMEND Policy 9(d) to read: 'Allowing, where multiple <u>farming enterprises</u> and <u>uses</u> contribute to a mitigation, for the resultants reduction in <u>diffuse</u> discharges to be apportioned to each <u>enterprise</u> and <u>use</u> in accordance with...'"</p> <p>Disallow; retain 'enterprises' and 'enterprise' and delete the word 'farming' instead so the policy applies to all enterprises, not just farming ones.</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 10	SUBMISSION POINT ID: V1PC1-235
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 11	SUBMISSION POINT ID: V1PC1-236
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter Miraka agrees there should be consistency in approach between point source and diffuse discharges; urban and rural. Miraka reserves its position on the specific mechanisms.	Part; concept Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 12	SUBMISSION POINT ID: V1PC1-239
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 13	SUBMISSION POINT ID: V1PC1-241
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter Miraka agrees there should be consistency in approach between point source and diffuse discharges; urban and rural, and that investment in enduring mitigations should be incentivised. Miraka reserves its position on the specific consent term and wording.	Part; concept Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 16	SUBMISSION POINT ID: V1PC1-249
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka strongly opposes the suggested deletion of Policy 16. We consider it appropriate that there be flexibility for development of tangata whenua ancestral lands, including land use change, given the historical impediments and ongoing inequities. We continue to seek amendments to Policy 16 as per our original submission to ensure that additional impediments are not inadvertently imposed through the specific wording.</p> <p>The intent of Objective 5 and Policy 16 is to enable the development of tangata whenua ancestral lands and minimise new impediments. Miraka therefore seeks a Controlled or Restricted Discretionary consenting pathway for change to land use on tangata whenua ancestral land, with discretion over the use of appropriate practices and mitigations and overall discharges.</p>	<p>Whole Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4	SUBMISSION POINT ID: V1PC1-290
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. This is in effect the technical component of sub catchment management plans (provided by Waikato Regional Council) that Miraka promotes. The sub catchment management plans themselves require community involvement.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4	SUBMISSION POINT ID: V1PC1-314
Do you support or oppose the submission? Oppose in part and support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka opposes the 75 th percentile nitrogen leaching value approach for reasons given in its original submission. However, in so far as any such approach may be retained, we support Federated Farmers' request for development of guidelines in consultation and collaboration with industry and stakeholders.	Part – 75th percentile Disallow Part – industry and stakeholder involvement Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.1	SUBMISSION POINT ID: V1PC1-257
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter Miraka also supports a collaborative approach and agrees that the best outcomes can only be achieved by working with stakeholders and the community. This is one of the fundamental principles of Practice Change, which is the key to achievement improvements in water quality.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.2	SUBMISSION POINT ID: V1PC1-258
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.3	SUBMISSION POINT ID: V1PC1-259
Do you support or oppose the submission? Support in part and oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports Federated Farmers' opposition to a blanket approach that requires all contaminants to be minimised everywhere without consideration of things like sub-catchment characteristics, proportionality etc. However, we consider that the Farm Environment Plan approach does allow for such consideration.</p> <p>Same reasons as those given by the submitter for the development of guidelines in consultation with stakeholders.</p> <p>Miraka agrees with Federated Farmers that not all FEPs need to be subject to a third-party audit. However, for the assurance of the wider community, we consider that all FEPs need to come under a third-party audit framework or scheme, and seek an amendment to reflect this. The provisions of the scheme itself should specify a risk approach, with more audits targeted to higher risk properties or enterprises.</p>	<p>Part; intent, and: <u>"In consultation with stakeholders, including industry bodies, Waikato Regional Council will develop guidance for risk assessments, auditing and compiling Farm Environment Plans."</u></p> <p>Allow</p> <p>Part; <u>"Robust third-party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring will will <u>may</u> be required."</u></p> <p>Disallow, but modify to achieve the same intent: Robust third-party audit <u>schemes</u> (independent of the farmer and Certified Farm Environment Planner) and monitoring will be <u>employed</u> required.'</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.5	SUBMISSION POINT ID: V1PC1-266
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter. Miraka reserves its position on the specific wording.	Part – concept Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.7	SUBMISSION POINT ID: V1PC1-295
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter, and in our original submission.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.8	SUBMISSION POINT ID: V1PC1-300
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.9	SUBMISSION POINT ID: V1PC1-305
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.10	SUBMISSION POINT ID: V1PC1-306
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter, if Miraka's relief sought to have FMU's identified at the sub catchment scale is not granted. Sub catchment scale accounting and monitoring is essential to achieve community education and engagement, which are important aspects of Practice Change, which will drive the water quality improvements that are being sought.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.11	SUBMISSION POINT ID: V1PC1-308
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.4.12	SUBMISSION POINT ID: V1PC1-312
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5	SUBMISSION POINT ID: V1PC1-499
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports a consent pathway to enable flexibility on low-discharge properties. We reserve our position on the specific mechanisms and wording.</p> <p>We note, however, that such a pathway should be available in relation to any of the contaminants, not just nitrogen, and should be subject primarily to the specific issues (contaminants and severity) identified in the associated sub catchment.</p> <p>Further, Miraka does not support the use of an NRP as a benchmark but only as a reference point, and strongly opposes the 75th percentile approach for reasons given in our original submission.</p>	<p>Part; A consent pathway providing some flexibility for low intensity activities Allow</p> <p>Part; Provisions that rely on Nitrogen Reference Points and the 75th percentile nitrogen leaching approach Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5	SUBMISSION POINT ID: V1PC1-571
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter Miraka reserves its position on the specific wording.	Part Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.1	SUBMISSION POINT ID: V1PC1-327
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter Miraka reserves its position on the specific wording.	Part Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.2	SUBMISSION POINT ID: V1PC1-338
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter Miraka reserves its position on the specific wording.	Part Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.3	SUBMISSION POINT ID: V1PC1-357
Do you support or oppose the submission? Support in part and oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter in general. However, Miraka opposes inclusion of the NRP as a benchmark and the 75 th percentile approach for the same reasons as in our original submission.	Part – concept and majority of wording Allow Part – addition of clauses re NRP and 75 th percentile Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.3	SUBMISSION POINT ID: V1PC1-357
Do you support or oppose the submission? Support in part and oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter in general. However, Miraka opposes inclusion of the NRP as a benchmark and the 75 th percentile approach for the same reasons as in our original submission.	Part – concept and majority of wording Allow Part – addition of clauses re NRP and 75 th percentile Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.6	SUBMISSION POINT ID: V1PC1-572
Do you support or oppose the submission? Support in part and oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter Miraka reserves its position on the specific wording, and opposes the inclusion of a relative industry sector contribution provision.	Part – concept and majority of wording Allow Part; <u>“(d) the relative contribution of the industry sector within which the farming enterprise belongs to the likely achievement of the short-term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision & Strategy referred to in Objective 1; and (e) the resources reasonably available to the farming enterprise.”</u> Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.7	SUBMISSION POINT ID: V1PC1-705
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule B – Nitrogen Reference Point	SUBMISSION POINT ID: V1PC1-717
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter Miraka reserves its position on the specific wording	Part Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule C – Stock exclusion	SUBMISSION POINT ID: V1PC1-758
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter, in particular regarding the purpose of Schedule C as a set of minimum standards, with the option of more stringent requirements identified in a FEP Miraka reserves its position on the specific wording	Part - concept Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 1	SUBMISSION POINT ID: V1PC1-766
Do you support or oppose the submission? Support in part Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports the submission point on the whole for the same reasons as those given by the submitter. We oppose the 75 th percentile approach, for reasons given in our original submission. Miraka reserves its position on the specific wording of the remainder, and in particular on the 'Most Practicable Action' concept.	Part; majority of wording Allow Part; " (7)(c) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th nitrogen leaching value by 1 July 2026 <u>2028</u> , except in the case of Rule 3.11.5.5, <u>Rule 3.11.5.6</u> or <u>Rule 3.11.5.7.</u> " Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 2	SUBMISSION POINT ID: V1PC1-780
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter Miraka reserves its position on the specific wording	Part - concept Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11-1	SUBMISSION POINT ID: V1PC1-783
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11-1	SUBMISSION POINT ID: V1PC1-785
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11-2	SUBMISSION POINT ID: V1PC1-787
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka maintains its original position that sub-catchments should not be prioritised with respect water quality improvement implementation, as the required change in water quality in the short term should be borne by all dischargers of contaminants across the whole region. We did, however, note that some prioritisation of sub catchments may be needed in relation to allocation of council staff resources, planning and funding. With respect to this prioritisation, we support Federated Farmers' suggested methodology for re-prioritisation of sub catchments, including the focus on 10-year targets.	Part (in so far as prioritisation is required and retained) Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11-2	SUBMISSION POINT ID: V1PC1-789
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Additions to Glossary of Terms	SUBMISSION POINT ID: V1PC1-792
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Additions to Glossary of Terms	SUBMISSION POINT ID: V1PC1-798
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports the inclusion of a new definition for Farming Enterprise for the same reasons as those given by the submitter We reserve our position on the specific wording	Part – concept Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Additions to Glossary of Terms	SUBMISSION POINT ID: V1PC1-802
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka is concerned that ‘Most Practicable Action’ has connotations which do not give assurance to the wider community, and would like to continue with Best Management Practice with clear understanding that these are applied as relevant and appropriate to the farm and sub-catchment.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition – 75 th percentile nitrogen leaching value	SUBMISSION POINT ID: V1PC1-790
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka opposes the 75 th percentile nitrogen leaching value approach, for the reasons given in our original submission. However, in so far as our relief sought may not be granted, we support Federated Farmers’ suggested amendment to the definition for the reasons given in their submission.	Part: “AMEND the definition of 75th percentile leaching value to ensure properties are not penalised because they are on leaky soil or have high rainfall.” Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Best management practice	SUBMISSION POINT ID: V1PC1-791
Do you support or oppose the submission? Oppose in part, support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka seeks to retain Best Management Practice as a concept. We are concerned that ‘Most Practicable Action’ has connotations which do not give assurance to the wider community, and would like to continue with Best Management Practice with clear understanding that these are applied as relevant and appropriate to the farm and sub-catchment. We support Federated Farmers’ contention that an approach should allow for proportionality and take into account specific circumstances including the sub catchment and farm.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Enterprise	SUBMISSION POINT ID: V1PC1-795
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka is concerned that restriction of the definition of enterprise may have adverse and unintended consequences.	Whole Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition – Good Management Practice	SUBMISSION POINT ID: V1PC1-800
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Federated Farmers of New Zealand	ORIGINAL SUBMITTER ID: 74191
ADDRESS OF ORIGINAL SUBMITTER: PO Box 447, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Enterprise	SUBMISSION POINT ID: V1PC1-795
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka is concerned that the introduction of division of the property or enterprise for the calculation of NRPs in the definition may have adverse and unintended consequences.	Whole Disallow

Fonterra Co-operative Group Ltd; ID 74057; V1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General; 3.11.5.4; Schedule 1; Additions to Glossary of Terms	SUBMISSION POINT ID: V1PC1-801; V1PC1-788; V1PC1-805; V1PC1-814, V1PC1-815
Do you support or oppose the submission?	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes the introduction of a Nitrogen Risk Scorecard. We oppose the emphasis on nitrogen as the determinant of the level of effort required, as it undermines one of the key approaches of PC1 which is to manage all four contaminants at a sub catchment level. The level of effort should be relevant to the identification of issues and their severity at the sub catchment level. Miraka also opposes the reliance on an Overseer-generated benchmark, for reasons of unreliability and uncertainty, as per our original submission.</p> <p>Miraka supports the minimisation of unnecessary administration. An alternative means of doing this, and one that is aligned with PC1 objectives and policies, would be to identify issues at a sub catchment scale and in those sub catchments with low contaminants a less comprehensive FEP would be needed.</p>	<p>Whole Disallow</p> <p>Part (principle of minimising unnecessary administration) Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2	SUBMISSION POINT ID: V1PC1-748
Do you support or oppose the submission?	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes the introduction of a Nitrogen Risk Scorecard for the reasons given in our further submission against V1PC1-801 above. In addition, we strongly oppose the use of an NRP as a regulatory benchmark, as Overseer does not have the required levels of accuracy and reliability, and because use of such a benchmark creates inequities. We oppose the 75th percentile for reasons given in our original submission on Schedule 1. The 75th percentile approach is neither equitable nor effective. Further, it is noted that nitrogen is not the key water quality issue for all sub-catchments, and therefore its reduction should not take precedence over the reduction of all other contaminant discharges.</p>	<p><i>Whole Disallow</i></p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 2; Policy 6; Policy 7; 3.11.5.2; 3.11.5.6; 3.11.5.7; Schedule 2; Additions to Glossary of Terms; Definition – Certified Industry Scheme	SUBMISSION POINT ID: V1PC1-755; V1PC1-1349; V1PC1-1353; V1PC1-1351; V1PC1-1368; V1PC1-1355; V1PC1-839; V1PC1-1374
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Wherever the Fonterra submission on Variation 1 seeks to “APPLY decision/s requested in accordance with the submitter’s PPC1 submission PC1-xxxxx, to the extent it is not modified by their V1 submission” or otherwise submits an equivalent decision requested, Miraka supports or opposes on the same points (whole or part) and for the same reasons as is given in Miraka’s further submission on Fonterra submission on PPC1	Part Allow Part Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.2	SUBMISSION POINT ID: V1PC1-765
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the simplification of rules for the same reasons as those given by the submitter.</p> <p>We oppose the focus on nitrogen leaching reference levels for determining the activity categories, as all four contaminants should be taken into account and their discharge risk should be managed in a similar way (i.e. through good management practice and further mitigation actions as specified in Farm Environment Plans.</p>	<p>Part; Simplification of the rule and specific sets of conditions to manage risks for the different activity categories</p> <p>Allow</p> <p>Part; Focus on nitrogen leaching reference levels</p> <p>Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.3	SUBMISSION POINT ID: V1PC1-779
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka opposes the additional changes Fonterra seeks to Rule 3.11.5.3, in particular the focus on the 75th percentile nitrogen leaching value and the introduction of a 50th percentile nitrogen leaching value, for the reasons given in our original submission. These reasons include the inequity associated with the determination of the 75th percentile nitrogen leaching value (or 50th percentile) and the concerns about the accuracy of Overseer for regulatory application.</p> <p>Miraka supports the removal of different dates for the provision of FEPs based on sub catchment priority, as we contend that good management practice and Farm Environment Plans should be applied to all properties and enterprises within the region as early as possible.</p>	<p>Part: “AMEND sections of Rule 3.11.5.3 as follows: 2. A Nitrogen Reference Point is produced<u>calculated</u> for the property or enterprise in conformance with Schedule B <u>within the period May 2020 to 30 November 2020</u>; and ... <u>Where the property or farm enterprise has a Nitrogen Reference Point below the 50th percentile nitrogen leaching value, either:</u> a. <u>The three-year rolling average for the property or enterprise does not exceed the Nitrogen Reference Point from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; or</u> b. <u>The property or enterprise has an annual Nitrogen Risk Scorecard Assessment Grade the same as the Nitrogen Risk Scorecard Assessment Grade as assessed in accordance with Schedule BA; and</u> c. <u>The information required to undertake the Nitrogen Risk Scorecard Assessment as set out in Schedule BA shall be provided to the Waikato Regional Council by 1 July each year in the template prescribed in Schedule BA e; or</u> 7. The Farm Environment Plan provided under Condition 5 may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be undertaken in accordance with the amended plan; and <u>Where the property or farm enterprise has a Nitrogen Reference Point above the 50th percentile nitrogen leaching value but below the 75th percentile nitrogen leaching value, the three-year rolling average does not</u></p>

	<p><u>exceed the Nitrogen Reference Point from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; or</u></p> <p><u>8. A copy of the Farm Environment Plan amended in accordance with condition (7) shall be provided to the Waikato Regional Council within 30 working days of the date of its amendment.</u></p> <p><u>Where the property or farm enterprise has a Nitrogen Reference Point above the 75th percentile nitrogen leaching value, the Farm Environment Plan for the property or enterprise will set out actions, timeframes and other measures to ensure that diffuse discharge of nitrogen is progressively reduced so that it does not exceed that 75th percentile nitrogen leaching value by 2026.</u></p> <p>AND RETAIN conditions 1, 3, 6, 7 and 8 as notified (but renumbered as appropriate.”</p> <p><i>Disallow</i></p> <p><i>Part:</i></p> <p>“AMEND sections of Rule 3.11.5.3 as follows:</p> <p>4. The Certified Industry Scheme meets the <u>criteria standards</u> set out in Schedule 2 and has been approved by the Chief Executive Officer of Waikato Regional Council; and</p> <p>5. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council as follows:</p> <p>a. <u>By 1 July 2021.</u> for properties or enterprises within Priority 1 sub-catchments listed in Table 3.11-2 and properties or enterprises within a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</p> <p>b. <u>By 1 July 2023</u> for properties or enterprises within Priority 2 sub-catchments listed in Table 3.11-2</p> <p>c. <u>By 1 July 2026</u> for properties or enterprises within Priority 3 sub-catchments listed in Table 3.11-2; and</p> <p>6. The use of land shall be undertaken in accordance with the actions and timeframes specified in the Farm Environment Plan; and</p> <p><i>Allow</i></p>
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Fonterra Co-operative Group Ltd	ORIGINAL SUBMITTER ID: 74057
ADDRESS OF ORIGINAL SUBMITTER: PO Box 459, Hamilton 3204	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Additions to Glossary of Terms	SUBMISSION POINT ID: V1PC1-812
Do you support or oppose the submission? Oppose	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
For reasons given in further submission on V1PC1-779 above	Whole Disallow

Horticulture New Zealand; ID 73801; V1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General; Objective 1; Objective 3; Objective 4; Reasons for adopting Objective 1; Reasons for adopting Objective 2; Reasons for adopting Objective 3; Reasons for adopting Objective 4; Policy 1, 3.11.4.7; 3.11.4.9; 3.11.5; Schedule 1; Schedule 2; Additions to Glossary of Terms; Definition – Best management practice; Definition – Enterprise; Definition – Good Management Practice	SUBMISSION POINT ID: V1PC1-1594, V1PC1-1622, V1PC1-1624, V1PC1-1602, V1PC1-1625, V1PC1-1626, V1PC1-1627, V1PC1-1628, V1PC1-1629, V1PC1-1637, V1PC1-1598, V1PC1-1614, V1PC1-1641, V1PC1-1599, V1PC1-1642, V1PC1-1615, V1PC1-1644, V1PC1-1616
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Wherever HortNZ’s submission on Variation 1 seeks to “APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-xxxx” or “APPLY to V1 the decision requested in accordance with the submitter’s PPC1 submission PC1-xxxx:”, Miraka supports or opposes on the same points (whole or part) and for the same reasons as is given in Miraka’s further submission on Waikato Regional Council submission on PPC1.	Part Allow Part Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: V1PC1-703
Do you support or oppose the submission? Support in part Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Miraka supports the strengthening of sub-catchment scale management, and is open to considering catchment collective responses. However, we reserve our position on the specific wording, and also on the relationship between an enterprise, a sub catchment management plan and a consent. For specific catchments where an entity covers a large part of it, that entity's Farm Environment Plan may in effect almost be a sub-catchment management plan. However, in most sub catchments, we envisage a sub catchment management plan that identifies the issues, loads, monitoring data and requirements and gives guidance on appropriate management practices and mitigations. Under this, there will be permitted or consented activities with Farm Environment Plans, either as individual properties/enterprises, or under a Certified Industry Scheme.</p>	<p>Part Allow</p> <p>Part Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: V1PC1-971
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	<p>Part; “AMEND PPC1 to implement a multi-contaminant approach to assessing intensification, based on the risk of Nitrogen, Phosphorus, Bacteria and Sediment discharging to water from land. AMEND PPC1 to ensure that it does not implement an allocation system based on Nitrogen only as a proxy for intensification.”</p> <p>Allow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 9	SUBMISSION POINT ID: V1PC1-892
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports the strengthening of sub-catchment scale management, and is open to considering collaborative management and catchment collective responses. However, we reserve our position on the specific wording, and also on the relationship between an enterprise, a sub catchment management plan and a consent. For specific catchments where an entity covers a large part of it, that entity's Farm Environment Plan may in effect almost be a sub-catchment management plan. However, in most sub catchments, we envisage a sub catchment management plan that identifies the issues, loads, monitoring data and requirements and gives guidance on appropriate management practices and mitigations. Under this, there will be permitted or consented activities with Farm Environment Plans, either as individual properties/enterprises, or under a Certified Industry Scheme.	Part Allow Part Disallow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.6	SUBMISSION POINT ID: V1PC1-902
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Same reasons as those given by the submitter.</p> <p>Miraka supports the strengthening of sub-catchment scale management, and is open to considering a consenting pathway for catchment collectives. However, we reserve our position on the specific wording, and also on the relationship between an enterprise, a sub catchment management plan and a consent. For specific catchments where an entity covers a large part of it, that entity's Farm Environment Plan may in effect almost be a sub-catchment management plan. However, in most sub catchments, we envisage a sub catchment management plan that identifies the issues, loads, monitoring data and requirements and gives guidance on appropriate management practices and mitigations. Under this, there will be permitted or consented activities with Farm Environment Plans, either as individual properties/enterprises, or under a Certified Industry Scheme.</p>	<p>Part Allow</p> <p>Part Disallow</p>

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Horticulture New Zealand	ORIGINAL SUBMITTER ID: 73801
ADDRESS OF ORIGINAL SUBMITTER: PO Box 10-232, Wellington 6143	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 2	SUBMISSION POINT ID: V1PC1-893
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

Iwi of Hauraki; ID 82006; V1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Iwi of Hauraki	ORIGINAL SUBMITTER ID: 82006
ADDRESS OF ORIGINAL SUBMITTER: PO Box 1585, Auckland 1140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Te Mana o te Wai: Mana Autua, Mana Tangata	SUBMISSION POINT ID: V1PC1-432
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Iwi of Hauraki	ORIGINAL SUBMITTER ID: 82006
ADDRESS OF ORIGINAL SUBMITTER: PO Box 1585, Auckland 1140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.1.2	SUBMISSION POINT ID: V1PC1-435
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Iwi of Hauraki	ORIGINAL SUBMITTER ID: 82006
ADDRESS OF ORIGINAL SUBMITTER: PO Box 1585, Auckland 1140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 5	SUBMISSION POINT ID: V1PC1-439
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Iwi of Hauraki	ORIGINAL SUBMITTER ID: 82006
ADDRESS OF ORIGINAL SUBMITTER: PO Box 1585, Auckland 1140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: V1PC1-441
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Iwi of Hauraki	ORIGINAL SUBMITTER ID: 82006
ADDRESS OF ORIGINAL SUBMITTER: PO Box 1585, Auckland 1140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5	SUBMISSION POINT ID: V1PC1-444
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Iwi of Hauraki	ORIGINAL SUBMITTER ID: 82006
ADDRESS OF ORIGINAL SUBMITTER: PO Box 1585, Auckland 1140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.7	SUBMISSION POINT ID: V1PC1-454
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Iwi of Hauraki	ORIGINAL SUBMITTER ID: 82006
ADDRESS OF ORIGINAL SUBMITTER: PO Box 1585, Auckland 1140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Tangata whenua ancestral lands	SUBMISSION POINT ID: V1PC1-455
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

Tuwharetoa Maori Trust Board; ID 73356; V1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuwharetoa Maori Trust Board	ORIGINAL SUBMITTER ID: 73356
ADDRESS OF ORIGINAL SUBMITTER: C/- Mitchell Daysh, PO Box 245, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: V1PC1-914
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuwharetoa Maori Trust Board	ORIGINAL SUBMITTER ID: 73356
ADDRESS OF ORIGINAL SUBMITTER: C/- Mitchell Daysh, PO Box 245, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 13	SUBMISSION POINT ID: V1PC1-1401
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
As per our further submission on the submitter's PPC1 submission point PC1-10301	As per our further submission on the submitter's PPC1 submission point PC1-10301

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuwharetoa Maori Trust Board	ORIGINAL SUBMITTER ID: 73356
ADDRESS OF ORIGINAL SUBMITTER: C/- Mitchell Daysh, PO Box 245, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 16	SUBMISSION POINT ID: V1PC1-1390
Do you support or oppose the submission? Oppose in part and Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
As per our further submission on the submitter's PPC1 submission point PC1-10364	As per our further submission on the submitter's PPC1 submission point PC1-10364

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Tuwharetoa Maori Trust Board	ORIGINAL SUBMITTER ID: 73356
ADDRESS OF ORIGINAL SUBMITTER: C/- Mitchell Daysh, PO Box 245, Taupo 3351	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Enterprise	SUBMISSION POINT ID: V1PC1-1426
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
As per our further submission on the submitter's PPC1 submission point PC1-10629	As per our further submission on the submitter's PPC1 submission point PC1-10629

Waikato Regional Council; ID 72890; V1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.1; 3.11.1.1; 3.11.1.2	SUBMISSION POINT ID: V1PC1-196, 197, 198
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Miraka supports the amendments that have arisen from consultation with Pare Hauraki. Miraka also supports amendments sought by Pare Hauraki that were not included in Variation 1, as per our Further Submission to Iwi of Hauraki's submission to Variation 1.	Part; "RETAIN amendments within 3.11.1 Values and Uses, arising from consultation with Pare Hauraki." Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: 3.11.5.1	SUBMISSION POINT ID: V1PC1-214
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Enterprise	SUBMISSION POINT ID: V1PC1-230
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter.	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato Regional Council	ORIGINAL SUBMITTER ID: 72890
ADDRESS OF ORIGINAL SUBMITTER: Private Bag 3038, Waikato Mail Centre, Hamilton 3240	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Objective 1; Schedule B – Nitrogen Reference Point; Schedule C – Stock exclusion; Schedule 1; Map 3.11.2; Definition – Best management practice; Definition - Enterprise	SUBMISSION POINT ID: V1PC1-1479; V1PC1-1494; V1PC1-1521; V1PC1-1522; V1PC1-1525; V1PC1-1527; V1PC1-1530
Do you support or oppose the submission? Support in part and Oppose in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Wherever the Waikato Regional Council submission on Variation 1 seeks to “APPLY decision/s requested in accordance with the submitter’s PPC1 submission PC1-xxxx, to the extent it is not modified by their V1 submission”, Miraka supports or opposes on the same points (whole or part) and for the same reasons as is given in Miraka’s further submission on Waikato Regional Council submission on PPC1.	Part Allow Part Oppose

Waikato and Waipa River Iwi; ID 74035; V1

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato and Waipa River Iwi	ORIGINAL SUBMITTER ID: 74035
ADDRESS OF ORIGINAL SUBMITTER: Kahui Legal, PO Box 1654, Wellington 6140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: General	SUBMISSION POINT ID: V1PC1-731
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
Same reasons as those given by the submitter	Whole Allow

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato and Waipa River Iwi	ORIGINAL SUBMITTER ID: 74035
ADDRESS OF ORIGINAL SUBMITTER: Kahui Legal, PO Box 1654, Wellington 6140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 7	SUBMISSION POINT ID: V1PC1-1235
Do you support or oppose the submission? Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
As per our further submission on the submitter's PPC1 submission point PC1-3320	As per our further submission on the submitter's PPC1 submission point PC1-3320

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato and Waipa River Iwi	ORIGINAL SUBMITTER ID: 74035
ADDRESS OF ORIGINAL SUBMITTER: Kahui Legal, PO Box 1654, Wellington 6140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Policy 16	SUBMISSION POINT ID: V1PC1-1233
Do you support or oppose the submission? Oppose in part and Support in part	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
As per our further submission on the submitter's PPC1 submission point PC1-3405	As per our further submission on the submitter's PPC1 submission point PC1-3405

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Waikato and Waipa River Iwi	ORIGINAL SUBMITTER ID: 74035
ADDRESS OF ORIGINAL SUBMITTER: Kahui Legal, PO Box 1654, Wellington 6140	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Definition - Enterprise	SUBMISSION POINT ID: V1PC1-1223
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
As per our further submission on the submitter's PPC1 submission point PC1-3674	As per our further submission on the submitter's PPC1 submission point PC1-3674