

***PROPOSED WAIKATO REGIONAL PLAN
CHANGE 1: WAIKATO AND WAIPAA
RIVER CATCHMENTS AND VARIATION 1
TO THE PROPOSED WAIKATO
REGIONAL PLAN CHANGE 1: WAIKATO
AND WAIPAA RIVER CATCHMENTS***

**Further submission on publicly notified proposal for plan change and
variation**

Dated: 17 September 2018

Waikato River Authority
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Submitted by:
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**FURTHER SUBMISSION IN SUPPORT OF, OR IN
OPPOSITION TO, SUBMISSIONS ON NOTIFIED
PROPOSAL FOR PLAN CHANGE AND VARIATION**

Waikato River Authority
21 Rostrevor Street
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17 September 2018

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Further Submission on Proposed Plan Change 1 and Variation to Proposed Waikato Regional Plan

1. The Waikato River Authority (the Authority) presents this submission in support of, or in opposition to submissions on the following proposals:
 - a. Propose Waikato Regional Plan Change 1 (PC1); and
 - b. Variation 1 to Proposed Waikato Regional Plan Change 1: Waikato and Waipaa River Catchments (Variation).
2. The Authority supports the intent of PC1 and the Variation, in particular as it relates to achieving the Vision and Strategy for the Waikato and Waipaa Rivers and all it embraces.

WAIKATO RIVER AUTHORITY AND VISION AND STRATEGY FOR THE WAIKATO RIVER (TE TURE WHAIMANA O TE AWA O WAIKATO)

3. The Waikato River Authority is an independent statutory body formed in 2010 under the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 and the Ngāti Tuwharetoa, Raukawa, and Te Arawa River Iwi Waikato River Act 2010, with additional responsibilities arising from the Ngā Wai o Maniapoto (Waipā River) Act 2012.
4. The Authority has ten Board Members who are appointed by the River iwi (5) and Ministers of the Crown (5), in particular the Minister for the Environment. The Authority is the sole Trustee of the Waikato River Clean-up Trust whose role is to fund projects which meet the purpose of the Authority.
5. The purpose of the Waikato River Authority is to:
 - I. set the primary direction through the Vision and Strategy to achieve the restoration and protection of the health and wellbeing of the Waikato River for future generations
 - II. promote an integrated, holistic, and co-ordinated approach to the implementation of the Vision and Strategy and the management of the Waikato River

- III. fund rehabilitation initiatives for the Waikato River in its role as trustee for the Waikato River Clean-up Trust.
6. The three Acts of Parliament that relate to the management of the Waikato River and its catchment (Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010, Ngāti Tuwharetoa, Raukawa, and Te Arawa River Iwi Waikato River Act 2010, Ngā Wai o Maniapoto (Waipā River) Act 2012) all provide legislative recognition of the Vision and Strategy for the Waikato River.
 7. The Vision & Strategy is the primary direction-setting document for the Waikato River and has the status of a National Policy Statement, prevailing over any inconsistent provision in any other National Policy Statement and the New Zealand Coastal Policy Statement, where there is a conflict. This is described in Figure 1.

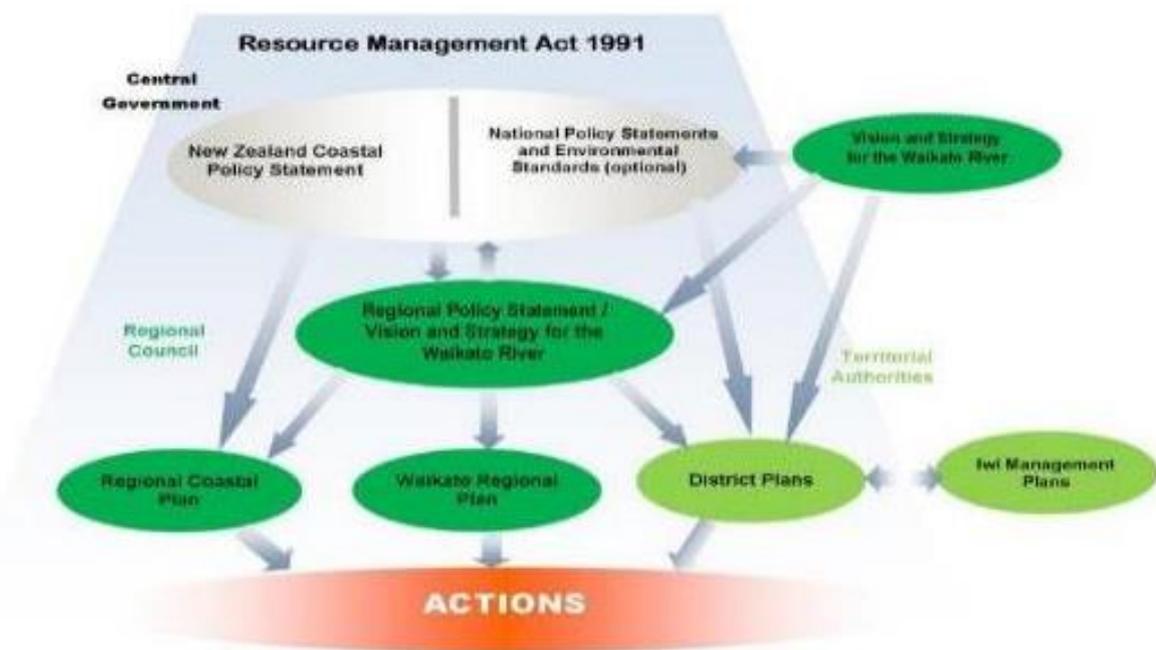


Figure 1 – Vision & Strategy legislative structure

8. The Vision & Strategy contains a set of objectives and strategies for the restoration and protection of the health and wellbeing of the Waikato River for present and future generations. These are as follows:
 - a. The restoration and protection of the health and wellbeing of the Waikato River.
 - b. The restoration and protection of the relationship of Waikato-Tainui with the Waikato River, including their economic, social, cultural, and spiritual relationships.
 - c. The restoration and protection of the relationship of Waikato River iwi according to their tikanga and kawa, with the Waikato River, including their economic, social, cultural and spiritual relationships.
 - d. The restoration and protection of the relationship of the Waikato region’s communities with the Waikato River including their economic, social, cultural and spiritual relationships.
 - e. The integrated, holistic and coordinated approach to management of the natural, physical, cultural and historic resources of the Waikato River.

- f. The adoption of a precautionary approach towards decisions that may result in significant adverse effects on the Waikato River, and in particular those effects that threaten serious or irreversible damage to the Waikato River.
 - g. The recognition and avoidance of adverse cumulative effects, and potential cumulative effects, of activities undertaken both on the Waikato River and within its catchments on the health and wellbeing of the Waikato River.
 - h. The recognition that the Waikato River is degraded and should not be required to absorb further degradation as a result of human activities.
 - i. The protection and enhancement of significant sites, fisheries, flora and fauna.
 - j. The recognition that the strategic importance of the Waikato River to New Zealand's social, cultural, environmental and economic wellbeing is subject to the restoration and protection of the health and wellbeing of the Waikato River.
 - k. The restoration of water quality within the Waikato River so that it is safe for people to swim in and take food from over its entire length.
 - l. The promotion of improved access to the Waikato River to better enable sporting, recreational, and cultural opportunities.
 - m. The application to the above of both Mātauranga Māori and latest available scientific methods.
9. The objectives within the Vision & Strategy encompass all people of the River and their relationships with it – through their communities, industries, recreation, social and cultural pursuits. It will take commitment and time to restore and protect the health and wellbeing of the Waikato River. Only by us all working together collaboratively and cooperatively in a coordinated approach will the Vision be realised.
10. This further submission does not retract, or overturn, from the Authority's original submission points made on PC1 and the Variation. These further submission points are in addition to the original submission points made.

Key points in the submission of the Authority

- 11. The Authority supports the collaborative approach for the preparation of PC1 and the Variation, in particular with all of the River Iwi, community representatives and major sectors within the Catchment.
- 12. The Authority acknowledges that the required changes to achieve the Vision & Strategy will take many years, and that PC1 and the Variation, provides a positive step to restoring and protecting the health and well being of the Waikato River, and all it embraces, for future generations.
- 13. The Authority's approach to preparing this further submission, was to cover a broad representation of resource users and community groups, instead of responding to each particular submission and their specific points. In particular, our focus was on:
 - I. Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission;
 - II. Support strengthening of monitoring and review provisions to ensure they consider progress against implementation and giving effect to the Vision & Strategy;

- III. Maintain support for the inclusion of existing water quality states in PC1 and the Variation;
- IV. Support strengthening of provisions to include a clear directive that current contaminant levels shall not increase;
- V. That existing and new discharges are regulated to ensure there is no further degradation of water quality;
- VI. Recognising the effect of historic barriers to development of taangata whenua ancestral lands and retention of this policy for land that has been returned or may be returned in the future; and
- VII. Opposing any extension of timeframes identified in PC1.

Decisions sought by the Authority

14. The submission points made by the original submitters, which are supported by the Authority, be allowed.
15. The submission points made by the original submitters, which the Authority has signalled a neutral position, be allowed insofar as they achieve the Vision & Strategy.
16. The submission points made by the original submitters, which are opposed by the Authority, be disallowed.
17. The Authority wished to be heard in support of this further submission.

Naaku noa, naa



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Waikato and Waipaa River Iwi (submitter ID 74035)

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
PC1 and Variation	ALL	All submission points to PC1 and the Variation	Support	The submission points further the objectives of the Vision & Strategy.

Auckland/Waikato Fish and Game (submitter ID 74085)

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
General	PC1-11007	<p>AND AMEND to give effect to the following points:</p> <p>6. That all remaining wetland habitats, particularly the Whangamarino wetland are recognised as significant and protected from further degradation and loss, and that their significant values including game bird values are protected, and the creation of new wetland habitats is facilitated;</p> <p>7. That the heightened significance of the Whangamarino wetland complex is recognised by way of a specific FMU, with the inclusion of appropriate attributes and targets in appropriate sites;</p> <p>8. That the objectives of PC1 and numerical attribute targets in Tables 3. 11-1 are capable of establishing a trajectory of improvement in water quality as measured through regular review periods to ensure that the water quality objectives of the Vision and Strategy are achieved in 80 years;</p> <p>9. That the objectives of PC1 and numerical attribute targets and limits are sufficient to safeguard life supporting capacity, ecosystem health and processes of fresh water, provide for the habitat of trout and indigenous fish, provide for primary contact recreation and cultural values including mahinga kai, and recognise and protect the natural character of rivers, lakes and wetlands;</p> <p>10. That Tables 3.11-1 includes appropriate attributes including limits and targets, which provide for the life supporting capacity, ecosystem health and processes, of fresh water, provide for the habitat of trout and indigenous fish, provide for primary contact recreation and cultural values including mahinga kai, and recognise and protect the natural character of rivers, lakes and wetlands. This includes the introduction of additional freshwater attributes as limits and targets, such as nitrate-nitrogen, phosphorus, and ecosystem health as measured through the macroinvertebrate community index (MCI) and other appropriate measures;</p> <p>11. That Tables 3.11-1 includes appropriate attributes to enable an accurate characterisation of water quality and ecosystem health and therefore enable regular reviews to assess the effectiveness of the provisions of the plan and progress towards its objectives, policies, limits, and targets</p> <p>13. That values, objectives, policies and methods (including rules) ensure that land is managed sustainably to achieve freshwater objectives, including the maintenance of water quality and where degraded, its improvement overtime;</p> <p>14. That Farm Environment Plans are placed into an appropriate and transparent framework of review and accountability;</p> <p>15. The inclusion of regulations which ensure that point and non-point discharges are managed and allocated within science-defined limits and that the property or enterprise-level allocation of discharges within these limits is equitable and consistent, efficient and effective, occurs as part of a trajectory of water quality improvement, and promotes sustainable management;</p> <p>16. That in at- or under-allocated sub-catchments (where freshwater objectives and targets are met but not exceeded), land use and ancillary discharge activities are regulated to ensure that at a minimum, that water quality is maintained;</p> <p>17. That in sub-catchments approaching, or at full allocation, and in over-allocated sub-catchments (where freshwater objectives and targets are currently being exceeded), land use and ancillary discharge activities are regulated to ensure that sub-catchments are placed on a trajectory of improvement;</p> <p>21. That provisions are included in the Plan to preserve the natural character of the coastal environment, wetlands, lakes and rivers and their margins and the protection of them from inappropriate subdivision, use and development;</p> <p>22. The inclusion of objectives, policies and methods (including rules) that holistically address sediment discharge and include diffuse sediment discharge from farming activities;</p>	Support	<p>Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission</p> <p>Support strengthening of monitoring and review provisions to ensure they consider progress against implementation and giving effect to the Vision and Values</p> <p>Support inclusion of existing water quality states in Table 3.11-1</p> <p>Support strengthening of the Farm Environmental Plan provisions to ensure there is a transparent process to ensure accountability and compliance with such plans.</p> <p>Support strengthening of provisions to include a clear directive that current contaminant levels shall not increase and that existing and new discharges are regulated to ensure there is no further degradation of water quality.</p>

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
3.11.2 Objectives	PC1-10790	<p>ADD a NEW Objective to read: <u>"New Objective: Restoration and protection of ecosystem health</u> <u>Ecosystem health is achieved in Waikato rivers, lakes and wetlands within 80 years as a result of staged reductions in point and non-point source discharges."</u></p> <p>AND ADD a NEW Objective to read: <u>"New Objective: Classification, Maintenance and Enhancement of Significant Wetlands</u> <u>a) All wetlands within the Waikato and Waipā catchments are assessed and added to Table 3.7.7 of the parent plan.</u> <u>b) Wetlands within the Waikato and Waipā catchments are maintained or enhanced to protect their ecosystems, including hydrological functioning and extent.</u></p>	Support	Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission.
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10809	AMEND Table 3.11-1 to adopt the relief sought in Appendix 1 of the submission (pages 66 to 69) for rivers and streams, and add appropriate indicators for lakes and wetlands.	Support	Support strengthening of provisions relating to lakes and wetlands, including inclusion in Table 3.11-1 for the reasons set out in the WRA submission.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-10887	<p>AMEND Policy 11 to read: "...Where it is not practicable to avoid or mitigate all adverse effects <u>all adverse effects cannot be reasonable avoided, they should be mitigated, and where they cannot reasonably be mitigated, an offset measure may should be proposed in an alternative location or locations to the point of discharge... provided that the:</u></p> <p>a. Primary discharge does not result in any significant or toxic adverse effects at the point of discharge location; and ... d. Offset measure remains in place for the duration of the consent and <u>is secured by consent condition and, if necessary, a bond in order to ensure it is achieved and maintained in the long term preferably in perpetuity; and</u> e. <u>Offset measure results in a predicted net decrease of the contaminant in the receiving environment</u></p>	Support	Policy 11 should explicitly require offsets and these offsets should result in a net contaminant loss improvement.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-10888	<p>REMOVE the word 'Additional' from the Policy 12 title AND REPLACE Policy 12 with the following: <u>"Impose conditions and discharge standards on point source discharges to ensure that the reduction targets and timeframes in Tables 3.11-1 and 3.11-2, and the sub-catchment nitrogen leaching reductions in Schedule E, can be met, based on a consideration of the contribution made by the discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads, and having regard to:</u></p> <p>a. <u>The relative proportion of nitrogen, phosphorus, sediment and microbial pathogens that the particular point source discharge contributes to the catchment; and</u> b. <u>Whether it is appropriate to stage future mitigation actions to allow investment costs to meet the water quality targets specified above to be spread over time.</u> c. <u>The need to favour caution and environmental protection where the information available is uncertain or inadequate."</u></p>	Support	Support strengthening of provisions in relation to point source discharges to ensure this pathway does not increase the contaminant load in the Waikato River
Policy 14: Lakes Freshwater Management Units	PC1-10903	<p>AMEND Policy 14 to ensure it directs maintenance, or where degraded, enhancement during the period of PPC1 operation AND AMEND to apply standards and targets based on appropriate attributes such as Trophic Level Indicator and ensure they are shown in the attribute table for individual sites within the Lakes Freshwater Management Units AND AMEND to produce and include appropriate standards and targets for wetlands and wetland Freshwater Management Units.</p>	Support	Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission.

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
3.11.4.4 Lakes and Whangamarino Wetland	PC1-10922	AMEND Method 3.11.4.4 to ensure at a minimum maintenance, or where degraded, enhancement during the period of PPC1 operation AND AMEND to apply short term standards and targets based on appropriate attributes such as Trophic Level Indicator and ensure they are shown in the attribute table for the Lakes Freshwater Management Units AND AMEND Method 3.11.4.4(g) to read: "Develop <u>Include</u> a set of short term water quality attribute targets for each Freshwater Management Unit <u>as a</u> minimum state to improve from in achieving the desired state."	Support	Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission.

Beef and Lamb (submitter ID 73369)

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
General	PC1-13160	AMEND to incorporate management frameworks into proposed V1 now which provide for land use and discharge permits to be consented for up to 35 years as is provided for under section 123(d) RMA.	Oppose	Do not support any increase to the consent terms set out in PC1 as notified
General	PC1-13152	WITHDRAW PPC1 in its current form	Oppose	WRA support the adoption of PC1 (subject to the amendments set out in the WRA submission)
General	PC1-13153	AMEND PPC1 and re-notify inclusive of amended stock exclusion policies and methods that are the same as the proposed national regulations AND AMEND policies and methods requiring the exclusion of stock from water and adopt methods that are set out in the national regulation for exclusion of stock from waterbodies	Oppose	WRA supports the stock exclusion policies from rivers and streams set out in PC1 as notified however seeks to include greater setbacks for lakes and wetlands
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12576	AMEND Policy 1 (a) as follows: "enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase "	Oppose	Do not support allowing an increase to discharges. PC1 should include a clear directive that existing contaminant levels should not increase.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12577	AMEND Policy 1 (c) as follows: "progressively excluding cattle, horses, deer, and pigs from rivers, stream, drains, wetlands and lakes <u>on land up to 15 degrees slope, and where break fed on land above 15 degrees slope</u>	Oppose	WRA supports the stock exclusion policies from rivers and streams set out in PC1 as notified however seeks to include greater setbacks for lakes and wetlands
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12710	AMEND Policy 2(a) as follows: "Taking a tailored, risk based approach to define mitigation actions on the land that will reduce to manage diffuse discharges of Nitrogen, Phosphorus, sediment and microbial pathogens..."	Oppose	Inconsistent with the Vision and Values which seeks a betterment. PC1 should include a clear directive that existing contaminant levels should not increase.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-11503	AMEND to enable consents to be granted for a term of 35 years	Oppose	Do not support any increase to the consent terms set out in PC1 as notified
Schedule 1 - Requirements for	PC1-12365	AMEND Schedule 1 (5) (a) to enable flexibility in Nitrogen discharges up to the sustainable Nitrogen discharge level, but where this is exceeded Nitrogen discharges shall not exceed the Nitrogen Reference Point.	Oppose	Do not support increases to Nitrogen discharges. PC1 should include a clear directive

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Farm Environment Plans				that existing contaminant levels should not increase.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipaa River catchments	PC1-11158	AMEND Table 3.11-1 interim targets so that they apply at a longer time frame such as 30 year	Oppose	Do not support an increase in the short-term timeframes set out in PC1 as this would increase the timeframes for restoration of the Waikato River. The proposed timeframes are important to give effect to the Vision and Values

Dairy NZ (submitter 74122)

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12592	AMEND Policy 1 to read: " <u>...d. Analysing and reporting the effects of mitigation actions to demonstrate Objective 3 is achieved, and acknowledging time lags in the water and on the land.</u> "	Support	WRA supports strengthening of monitoring provisions to ensure they consider progress against implementation and giving effect to the Vision and Strategy
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-10196	AMEND Policy 1 to read: "Policy 1: Manage diffuse <u>and point source</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens/ Te Kaupapa... 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> <u>i. each farm and enterprise and demonstrating achievement of industry-agreed good management practice, and;</u> <u>ii. pastoral farms with moderate to high levels of nitrogen leaching over a specified amount contaminant discharge to water bodies, or for to reduce their nitrogen discharges; and...</u> c. Progressively excluding cattle, horses, deer, pigs from rivers, streams, drains, wetlands and lakes; <u>and"</u>	Oppose	Narrowing the focus to nitrogen only is not consistent with seeking improvement management of the four identified contaminants.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12741	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..."	Oppose	The Vision and Strategy seeks restoration of the Waikato River, which cannot be achieved unless discharges are reduced.
Schedule 1 - Requirements for Farm Environment Plans	PC1-10255	AND AMEND to ensure that a 5m cultivation setback from water bodies in low risk areas is not necessary if critical source areas have been identified and mitigations put in place	Oppose	WRA supports the stock exclusion policies from rivers and streams set out in PC1 as notified however seeks to include greater setbacks for lakes and wetlands

Department of Conservation (submitter ID 71759)

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
General	PC1-8090	AMEND PPC1 by clearly stating the freshwater values, objectives and limits for each Freshwater Management Unit, AND identifying appropriate methods to achieve the limits (refer to diagram under point 36 of the submission)	Support	Support strengthening of provisions relating to lakes and wetlands and strengthening of

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
		<p>AND establish a separate Freshwater Management Unit (FMU) for the Whangamarino Wetland as per the map in Appendix D of the submission, AND include the attributes and values for the FMU described in Appendix E and F of the submission, AND develop an objective and policy framework to acknowledge the importance of the Whangamarino.</p> <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 include on-going monitoring and an adaptive approach to the management of the turbidity</p> <p>AND AMEND PPC1 to protect the significant values of wetlands...</p> <ul style="list-style-type: none"> • Adopt narrative objectives that relate to water quality • Establish a programme for benchmarking of wetland nutrients and sediment status and its relationship to ecosystem health (plants, fish, mahinga kai) • Establish wetland numeric targets by 2025 (based on attributes suggested in submitters Appendix G). <p>AND AMEND to adopt lake attributes in Appendix I of the submission and prioritise lakes for management (highest priority lakes are suggested in Appendix H of the submission).</p> <p>AND ESTABLISH attributes, limits or targets for all contaminants specified in the Vision and Strategy (nutrients, faecal and sediment) for the whole of the Waipā catchment and all tributaries of the Waikato, lakes, wetlands and the coastal environment (refer submitter's Appendices A and B, and D to J).</p>		monitoring provisions for the reasons set out in the WRA submission
3.11 Waikato and Waipaa River Catchments	PC1-10465	<p>AND AMEND to include Freshwater Management Units for each individual lake and its catchment.</p> <p>AND AMEND to recognise previous lake management work, and farm plans already in existence that manage particular lakes, and to recognise the investment already made (refer submitters Appendix J for existing management planning).</p>	Support	Support strengthening of provisions relating to lakes and wetlands and support the use of existing knowledge for the reasons set out in the WRA submission
Intrinsic values - History	PC1-8136	AMEND Intrinsic Values - History to include relationships of River Iwi to lakes, wetlands and the coastal environment as well as rivers	Support	Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission
Intrinsic values – Ecosystem Health	PC1-8139	<p>EXPAND on the broadly defined Ecosystem Health value to effectively provide for ecological health, ecosystem processes and biological diversity at specific locations, including as a minimum additional values to recognise inanga spawning, native fish migration, biodiversity hotspots (e.g. areas that are particularly outstanding due to their high proportion of native species and their role as a native species 'refuge'), and threatened/at risk species. AND AMEND 4th bullet point to recognise that while wetlands are important for attenuation of natural flood events, artificial flood storage can have detrimental effects on ecosystem health</p> <p>AND AMEND the 4th bullet point to recognise that while wetlands do have a nutrient/cycling function, they also need clean freshwater to achieve ecosystem health</p> <p>AND ADD a NEW bullet point to protect and restore shallow lakes so they are dominated by submerged native aquatic plants</p> <p>AND ADD a NEW bullet point to ensure lakes exhibit good water quality and are resilient to environmental disturbance and are not algal dominated</p> <p>AND ADD a NEW bullet point to support diverse native species populations including freshwater fish, birds and invertebrates in lakes and wetlands</p> <p>AND ADD a NEW bullet point to ensure that the ecosystem health of wetlands exhibit low disturbance from sediment, nutrients and water level change affecting water quality, are resilient to environmental disturbance and are dominated by native wetland vegetation</p> <p>AND ADD a NEW bullet point to ensure that the extent and ecological integrity of all wetlands is maintained and enhanced, providing for ecosystem services (water quality) and ecosystem health.</p>	Support	Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Intrinsic values - Natural form and character	PC1-8152	RETAIN and AMEND the Intrinsic value 'Natural form and character' to include lakes, wetlands and the coastal environment as well as rivers. AND AMEND the attributes and characteristics of the Intrinsic value 'Natural form and character' to include natural elements, processes and patterns; biophysical, ecological, geological and geomorphological aspects; natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs; the natural movement of water and sediment including hydrological and fluvial processes; the natural darkness of the night sky (in the coastal environment); places or areas that are wild and scenic; a range of natural character from pristine to modified; and experiential attributes and their content or setting.	Support	Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission
Use values - Wai tapu	PC1-8532	AMEND the Use values - Wai tapu to be expanded to include lakes, wetlands and the coastal environment as well as rivers.	Support	Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission
Use values - Mahinga kai	PC1-8533	AMEND Use values - Mahinga kai to include lakes, wetlands and the coastal environment as well as rivers.	Support	Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission
Use values - Human health for recreation	PC1-8535	AMEND Use values - Human health for recreation to include lakes, wetlands and the coastal environment as well as rivers.	Support	Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission
Use values - Transport and tauranga waka	PC1-8540	AMEND Use values - Transport and Tauranga waka to include lakes, wetlands and the coastal environment as well as rivers	Support	Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission
3.11.2 Objectives	PC-10521	AMEND PPC1 to clearly identify freshwater objectives that recognise and provide for intrinsic values for each Freshwater Management Unit. AND AMEND PPC1 objectives so that they reflect a robust analysis under section 32 of the Resource Management Act. AND ADD a NEW objective which safeguards ecosystem health and the health of indigenous species. AND ADD a NEW objective that recognises and provides for the values of freshwater fish species identified in Appendix C of the submission [See submission]. AND ADD a NEW objective relating to Whangamarino Wetland, and the significant values of all wetlands that achieves the following: <ul style="list-style-type: none"> recognises the values and significance of the Whangamarino as a whole wetland system, comprising marsh, swamp, fen and bog wetland types. gives effect to the National Policy Statement Freshwater Management in recognising and protecting the significant wetlands and overall quality of freshwater is improved. AND ADD a NEW objective which recognises the significant values of all wetlands. AND ADD a NEW objective which recognises that all sediments and nutrients in the region ultimately accumulate in the Waikato Estuary, and which seeks restoration of healthy ecosystems from the mountains to the sea, including in estuaries.	Support	Support strengthening of provisions relating to lakes and wetlands for the reasons set out in the WRA submission and the inclusion of provisions related to freshwater fish species
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10540	AMEND Objective 3 so that 10 year targets for water quality improvement be set for lakes using existing available expertise and models to prioritise those lakes to achieve a 20% improvement within 10 years. AND AMEND PPC1 to include the management of discharges of contaminants from point sources.	Support	Support strengthening of provisions relating to lakes and wetlands and the use of existing information on current water state for the reasons set out in the WRA submission Support the includes of management of discharges from point sources for the reasons set out in the WRA submission

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Objective 4: People and community resilience	PC1-10542	AMEND Objective 4 to remove the term 'continue'. 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 clause (a) to require that at least intrinsic values are recognised and provided for. 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.	Support	Support strengthening of provisions relating to prevention of further degradation of water quality or increases in contaminant load along with a clear directive that there should be no increase from current contaminant load for the reasons set out in the WRA submission
3.11.3 Policies	PC1-10639	ADD NEW policies [and rules] to protect inanga spawning habitat.	Support	Support addition of policies related to inanga spawning habitat
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-10643	AMEND Policy 1 to replace " manage and require reductions " with " <u>reduce</u> ". 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.	Support	Support strengthening of provisions relating to prevention of further degradation of water quality or increases in contaminant load along with a clear directive that there should be no increase from current contaminant load for the reasons set out in the WRA submission
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-10646	AMEND Policy 2 to provide clearer direction to landowners and PPC1 users by amending Policy 2 to read: " Manage and require reductions in <u>Reduce</u> sub-catchment wide diffuse discharges..."	Support	Support strengthening of provisions relating to prevention of further degradation of water quality or increases in contaminant load through diffuse discharges along with a clear directive that there should be no increase from current contaminant load for the reasons set out in the WRA submission
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-10653	AMEND Policy 3 to read as follows: " Manage and require reductions in <u>Reduce</u> diffuse discharges of nitrogen..." AND AMEND to provide clarity of the outcomes of the proposed wording 'reducing average contaminant discharges over time'. AND AMEND PPC1 to introduce a more efficient land-based allocation regime.	Support	Support strengthening of provisions relating to prevention of further degradation of water quality or increases in contaminant load through diffuse discharges along with a clear directive that there should be no increase from current contaminant load for the reasons set out in the WRA submission
Policy 8: Prioritised implementation	PC1-10670	AMEND Policy 8 in a way that would see all wetland and lake sub-catchments being included as Priority 1 in Table 3.11-2.	Support	Support including all lake sub-catchments as Priority 1 for the reasons set out in the WRA submission
Policy 13: Point sources consent duration	PC1-10739	AMEND Policy 13 to include a common catchment expiry date for consent terms rather than a blanket 25 year consent term.	Neutral	Neutral with regard to common catchment expiry date for consent terms as long as this would not result in consent terms longer than 25 years (except as already provided for in PC1)
Policy 14: Lakes Freshwater Management Units	PC1-10742	AMEND Policy 14 to require that the restoration of lakes be implemented using existing data and information from work already completed to avoid further delay in improving lake water quality.	Support	Support strengthening of provisions relating to lakes and wetlands and the use of existing information on current water state for the reasons set out in the WRA submission
Policy 17: Considering the wider context of the Vision and Strategy	PC1-10746	AMEND Policy 17 to reflect the clear direction provided in higher level documents including the Resource Management Act, the National Policy Statement for Freshwater Management and the Vision and Strategy for Waikato and Waipā Rivers. AND DELETE all reference to the wording 'secondary benefit'.	Oppose	Seek to retain Policy 17 as drafted to give effect to the Vision and Strategy. Would not object to the Resource Management Act, the National Policy Statement for Freshwater Management being referenced in a separate policy

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
3.11.4 Implementation methods	PC1-10633	<p>AND ADD a NEW Method which prioritises the capture of key information to inform the management of lakes with little or no recent water quality information e.g. Te Otamanui Lagoon, Lake Rotongaroto, Lake Rotongaro, Lake Rotokaraka, Lake Hotoananga, Lake Pikopiko, Lake Komakoru, Lake Rotokaeo, Lake Opuatia.</p> <p>AND ADD a NEW method to prioritise further research on nutrient and sediment attenuation tools for use in lake catchments.</p> <p>AND ADD regulatory methods for private land in lake catchments where protection works on public land adjoining lakes has been completed, where the regulatory methods require fencing around waterbodies and the planting of vegetative buffers, together with compulsory implementation of farm management plans. AND ADD a NEW Method or Methods into PPC1 to actively reflect current best practice in relation to the protection of peat lakes. At a minimum the method or methods should focus on maintaining ground water levels over the summer periods, creating good buffer zones, and reducing cultivation on peat solids or establishing large setbacks from cultivation to reduce the effects of peat shrinkage on the lake ecosystem.</p> <p>AND ADD a NEW Method to ensure that the significant values of all wetlands are not impacted by elevated levels of nutrient and sediment by supporting:</p> <ul style="list-style-type: none"> fencing setbacks of 10m for all wetlands, requirements that Farm Environment Plans identify critical wetland areas, and identify how elevated nutrients/sediment will be avoided or mitigated, requirements that Farm Environment Plans to identify where existing wetland drainage can be restored to prevent the drying of wetlands, benchmarking of wetland nutrient and sediment status by 2023, and establishment of a research programme to determine the attenuation capacity of natural wetlands. <p>AND ADD a NEW method to achieve the targets for the proposed Whangamarino wetland Freshwater Management Unit outlined in Appendix E and F of the submission, that supports:</p> <ul style="list-style-type: none"> Investment in catchment wide programmes to reduce critical sediment sources Minimum fencing set-backs of 10 metres for all contributing streams/rivers Investment in collaborative stakeholder programmes to reduce Lake Waikare bank erosion development of a mitigation strategy to address sediment, nitrogen and phosphorus from drains entering natural waterways in the Freshwater Management Unit A review of all consents that relate to the Lower Waikato Flood Control Scheme by 2020, to identify the optimal approach to address water quality <p>AND ADD a NEW Method with the new text from Policy 7 'To ensure this occurs, collect information and undertake research... should take advantage of new data and knowledge'</p>	Support	Support strengthening of provisions relating to lakes and wetlands and the use of existing information on current water state for the reasons set out in the WRA submission
3.11.4.4 Lakes and Whangamarino Wetland	PC1-10573	<p>AMEND Method 3.11.4.4 to implement and action existing lake management plans and strategies as a priority. AND AMEND to provide greater certainty regarding the management of shallow lakes, including providing objectives, targets and limits for the future management and enhancement of shallow lakes.</p> <p>AND AMEND to ensure that existing farm plans are enforced and the expansion of work on private properties, beyond works already undertaken on Council and public conservation estate reserves, be undertaken as a matter of priority. This should include; retirement of wetland areas, increasing setbacks from waterways, and design and construction of sediment traps in key locations.</p> <p>AND AMEND so that where there is an evidence-based description of the problem, the focus needs to be on using this information in implementing lake catchment plans.</p> <p>AND RETAIN Method 3.11.4.4 (d), (e), (f) and (g)</p>	Support	Support strengthening of provisions relating to lakes and wetlands and support strengthening of provisions in relation to accountability and compliance with Farm Plans for the reasons set out in the WRA submission
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-11052	<p>AMEND Method 3.11.4.11 to make a clear link between this method for monitoring and evaluation the implementation of Chapter 3.11 and the accounting and monitoring system developed under Method 3.11.4.10,</p> <p>AND AMEND Method 3.11.4.11 to provide more specificity around the frequency of reporting, with 3-yearly reporting</p>	Support	Support strengthening of monitoring provisions to ensure they consider progress against implementation for the reasons set out in the WRA submission

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
		recommended.		
Table 3.11-2: List of sub-catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments	PC1-11067	<p>AMEND Table 3.11-2 so that all wetland and lake sub-catchments are included as Priority 1.</p> <p>AND AMEND Table 3.11-2 to recognise the existing works that have already been undertaken for lakes by way of lake restoration plans and farm environment/management plans, AND ensure that the Table reflects the need for their immediate implementation and enforcement [refer Appendix J of the submission - Existing Lakes Management and Planning].</p> <p>AND AMEND to insert Pungarehu Canal/Stream to Table 3.11-2 as Priority 1.</p> <p>AND AMEND Table 3.11-2 so that the identified lakes in Appendix H of the submission [see Appendix H of the submission] be actioned within 1-2 years of PPC1 being made operative, with the management of the remainder of the lakes being actioned within 5 years from the date of the PPC1 being made operative.</p> <p>AND review sub-catchments to ensure they are appropriate for the holistic management of individual lakes through individual Freshwater Management Units.</p>	Support	Support including all lake sub-catchments as Priority 1 for the reasons set out in the WRA submission

Federated Farmers of New Zealand (submitter ID 74191)

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
3.11.1 Values and uses for the Waikato and Waipaa Rivers	PC1-10810	RETAIN Section 3.11.1, subject to refinement through the further submissions process.	Support	Support the retention of Section 3.11.1 as it addresses the Vision and Strategy
3.11.2 Objectives	PC1-10811	RETAIN the Objectives in Section 3.11.2, other than Objective 5 (b), subject to refinement through the further submissions process.	Oppose	Policy 16 recognises the effect historic barriers to development of taangata whenua ancestral lands and retention of this policy for land that has been returned or may be returned in the future
Objective 5: Mana Tangata – protecting and restoring tāngata whenua values	PC1-10814	DELETE Objective 5 (b).	Oppose	Policy 16 recognises the effect historic barriers to development of taangata whenua ancestral lands and retention of this policy for land that has been returned or may be returned in the future
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12754	<p>RETAIN Policy 2, subject to refinement through the further submissions process.</p> <p>AND ADD Policy 2 (f), as follows:</p> <p>"f. When determining an appropriate duration for any consent granted consider the following matters:</p> <p>i. A consent term of a minimum of 25 years is appropriate; and</p> <p>ii. A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policy 2.a. – 2.e. will be met; and</p> <p>iii. The magnitude and significance of the investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality; and</p> <p>iv. The need to provide appropriate certainty of investment where contaminant reduction measures are proposed (including investment in treatment plant upgrades or land based application technology)."</p>	Oppose	Do not support an increase in consent term timeframes other than as already provided for by PC1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12755	AMEND Policy 2 (e) as appropriate to give effect to the 'Keeping stock out of our waterways' provisions of the government's Clean Water Package 2017.	Oppose	WRA supports the stock exclusion policies from rivers and streams set out in PC1 as notified however seeks to include greater setbacks for lakes and wetlands

Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-10817	<p>AMEND Policy 3 to provide vegetable production exemption from the general nutrient discharge restrictions, provided industry certified good management practices are followed, AMEND Policy 3 to read:</p> <p>"Manage and require reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from commercial vegetable production through a tailored, property or enterprise-specific approach where:</p> <p>a. Flexibility is provided to undertake crop rotations on changing parcels of land for commercial vegetable production, while reducing average managing contaminant discharges over time; and</p> <p>b. The maximum area in production for a property or enterprise is established and capped utilising commercial vegetable production data from the 10 years up to 2016; and</p> <p>c. Establishing a Nitrogen Reference Point for each property or enterprise; and</p> <p>d. A 10% decrease in The diffuse discharge of nitrogen, and a tailored reduction in the diffuse discharge of phosphorus, sediment and microbial pathogens is achieved across the sector managed through the implementation of Best or Good Management Practices; and</p> <p>e. Identified mitigation actions are set out and implemented within timeframes specified in either a Farm Environment Plan or associated resource consent, or in specific requirements established by participation in a Certified Industry Scheme.</p> <p>f. Commercial vegetable production enterprises that reduce manage nitrogen, phosphorus, sediment and microbial pathogens are enabled and</p> <p>g. The degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens is proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and the scale of water quality improvement required in the sub-catchment."</p>	Oppose	WRA does not support vegetable production exemption from the general nutrient discharge restrictions of PPC1
Policy 7: Preparing for allocation in the future	PC1-10823	<p>AMEND Policy 7 to read:</p> <p>"Policy 7: Preparing for allocation in the future/Te Kaupapa Here 7: Kia takatūki ngā tohanga hei ngā tau e <u>E Teuteu ki he te heke mai Ana</u></p> <p>Prepare for further diffuse discharge reductions and any future property or enterprise-level allocation of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will may be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'.</p> <p>Any future allocation should consider the following principles:</p> <p>a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation); and</p> <p>b. Allowance for flexibility of development of tangata whenua ancestral land; and</p> <p>c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and</p> <p>d. Future allocation decisions should take advantage of new data and knowledge.</p> <p><u>The Nitrogen Reference Point established under Policy 2.c. is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future."</u></p>	Oppose	WRA oppose amendments to Policy 7 in order to give effect to the Vision and Strategy.
Policy 14: Lakes Freshwater Management Units	PC1-10832	<p>RETAIN Policy 14, subject to refinement through the further submissions process.</p> <p>AND CONSIDER the PPC1 focus on rivers compared to lakes in the Waikato.</p>	Oppose	WRA opposes focus of PC1 to be on rivers compared to lakes in the Waikato and seeks strengthening of provisions in relation to lakes and wetlands.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and	PC1-10834	DELETE Policy 16.	Oppose	Policy 16 recognises the effect historic barriers to development of tangata whenua ancestral lands and retention of this policy for land that has been returned or may be returned in the future

multiple owned Māori land				
Policy 17: Considering the wider context of the Vision and Strategy	PC1-10837	DELETE Policy 17.	Oppose	WRA does not support the deletion of Policy 17 as it does not give effect to the Vision and Strategy
3.11.4.7 Information needs to support any future allocation	PC1-10840	AMEND Method 3.11.4.7 to read: “3.11.4.7 Information needs to support any future allocation/ Ngā pārongo e hiahiatia ana hei taunaki i ngā tohanga o anamata Gather information and commission appropriate scientific research to inform any future framework for the allocation the <u>management</u> of diffuse discharges including: a. Implementing processes that will support the setting of property or enterprise-level diffuse <u>management of discharges limits</u> in the future...”	Oppose	WRA opposes the amendments as it removes signalling of future changes.
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-10841	AMEND Method 3.11.4.8 to read: “3.11.4.8 Reviewing Chapter 3.11 and developing an allocation <u>discharges management</u> framework for the next Regional Plan/Te arotake i te Upoko 3.11, te whakarite hoki i tētahi anga toha para mō te Mahere ā-Rohe e whai ake ana Waikato Regional Council will: a. Develop discharge allocation management <u>frameworks for individual properties and enterprises</u> based on information collected under Method 3.11.4.7, taking into account the best available data, knowledge and technology at the time; and b. Use this to inform future changes to the Waikato Regional Plan to manage discharges of nitrogen, phosphorus, sediment and microbial pathogens at a property or enterprise-level to meet the targets^ in the Objectives.”	Oppose	WRA opposes the amendments as it does not align with the vision and strategy.
3.11.5 Rules	PC1-10844	AMEND 3.11.5 Rules to bring them into alignment with the Policies and Methods in PPC1, as sought to be amended by the submissions made herein, and subject also to additional refinement through the further submissions process. AND ADD a NEW rule to PPC1 to implement the policy of providing an exemption from Farm Environment Plans and Certified Industry Schemes for those emitting less than 15KgN/ha. AND DELETE Rule 3.11.5.2 (4) (c). AND ADD a NEW permitted activity rule to read: <u>“The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u> <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u> <u>2) The change in the numbers of breeding cattle, deer, pigs or horses does not exceed 15% of the numbers used to establish the Nitrogen Reference Point; or</u> <u>3) The change in the numbers of trading cattle, deer, pigs or horses does not exceed 15% of the numbers used to establish the Nitrogen Reference Point.”</u> AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities. AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities. 3.11.5.7 Non-Complying Activity Rule – Land Use Change PC1-10845 Oppose the provision with amendments	Oppose	WRA opposes the amendments to Rule 3.11.5 as they do not support a reduction in existing contaminant discharges.
Schedule C - Stock exclusion	PC1-10852	AMEND Schedule C to ensure that the purpose for which information is being sought is clearly stated AND ENSURE that it is within Councils powers to seek all of the information sought in Schedule C AND ENSURE that the information sought by Council is no more than is necessary to achieve the purposes for which it is sought AND ENSURE that the requirements set out in Schedule C match the Policies, Methods, definitions, etc. to which Schedule C relates AND REMOVE requirements for fencing off water bodies AND AMEND to adopt the Government’s Clean Water Package 2017 stock exclusion standards as an interim measure	Oppose	WRA supports the stock exclusion policies from rivers and streams set out in PC1 as notified however seeks to include greater setbacks for lakes and wetlands

		AND DEVELOP more detailed proposals at a sub-catchment level later, through a freshwater management unit based assessment, and implemented then through a sub-catchment based plan change AND MAKE any consequential amendments to PPC1.		
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Fonterra Co-operative Group Ltd (submitter ID 74057)

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Reasons for adopting Objective 1	PC1-10622	AMEND the reasons for adopting the Objective 1 to read: "...Objective 1 sets a long term limits ^{goal} for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80-year <u>desired</u> water quality targets ^{states} , which result in improvements in water quality from the current state monitored in 2010-2014. The water quality <u>states</u> attributes ^{attributes} listed in Table 3.11-1 that will be achieved by 2096 will be used to characterise the <u>desired</u> water quality of the different Freshwater Management Units when the effectiveness of the objective is assessed. <u>Objective 1 gives effect to the Vision and Strategy.</u> "	Oppose	Do not support change from target/limit to goal unless it demonstrates that this change in terminology does not weaken the intent
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-10469	AMEND Policy 1 so the policy test that applies to the enablement of low discharging activities is consistent with Policy 4, amend to read: "...a) Enabling activities with a low level of contaminant discharge to water bodies <u>consistent with Policy 4</u> provided those discharges do not increase ; and..."	Oppose	Removal of wording "provided those discharges do not increase" is not consistent with the Vision and Strategy. PC1 should include a clear directive that existing contaminant levels should not increase.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-10619	AMEND Policy 3 to read: "...b. The maximum are in production for a property or enterprise <u>in any single year</u> is established and capped <u>at the largest area in production for that property or enterprise in any single year over the 10 year period ending 1 January 2016 as determined by utilising</u> commercial vegetation production data from the 10 years up to 2016; and... d. A 10% decrease <u>by 2026</u> in the <u>rate of</u> diffuse discharge of nitrogen <u>relative to the Nitrogen Reference Point</u> and..." AND DELETE Policy 3 part g. AND REPLACE with the following: "...g. <u>Requiring Farm Environment Plans to identify the areas and activities representing diffuse discharge risks and the most effective way of managing those risks on the particular property.</u> "	Support	Support suggested amendment to include timeframe: d. A 10% decrease <u>by 2026</u> in the rate of diffuse discharge of nitrogen...
Policy 8: Prioritised implementation	PC1-10489	DELETE Policy 8. AND AMEND PPC1 so that all activities with an obligation to prepare and submit a Farm Environment Plan be required to do so by 1 July 2020.	Neutral	Neutral with regard to any timeframes being shortened as long as timeframes remain achievable. Opposed to any extension of the timeframes set out in PC1.

Fonterra Shareholders Council (submitter ID 72610)

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-10635	AMEND Objective 2 to make the intent clearer as follows: "Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment, <u>which and the restoration and protection is undertaken in a way and at a rate that enables the people and communities to continue to provide for their social, economic and cultural well-being.</u> "	Neutral	Support the principle of the proposed wording; however, opposed to any increase in the timeframes for restoration set out in PC1 (including timeframes for meeting the short term targets).

Genesis Energy Ltd (submitter ID 74052)

Plan Section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-8801	AMEND Policy 11 to read: "...Where it is not practicable to avoid or mitigate prevent or minimise all adverse effects, an offset measure may be proposed <u>by that person</u> in an alternative location or locations to the point source discharge, for the purpose of ensuring positive effects on the environment to lessen any <u>the</u> residual adverse effects of the discharge(s) that will or may result from allowing the activity provided that the: <ul style="list-style-type: none"> a. <u>a.</u> Primary discharge does not result in any significant toxic adverse effect at the point source discharge location; b. <u>b.</u> Offset measure is for the same contaminant; and b. <u>b.</u> Offset measure occurs preferably within the same sub-catchment in which the primary point source discharge occurs and if this is not practicable, then within the same Freshwater Management Unit or a Freshwater Management Unit located upstream, and d. <u>c.</u> Offset measure remains in place for the duration of the consent and is secured by consent condition," 	Oppose	Retain policy 11 as originally proposed in order to give effect to the Vision and Strategy.

Horticulture NZ (submitter 73801)

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-9945	AMEND Objective 3 to read: <p>"... A ten percent change towards the long term water quality attribute improvements is indicated by the short term water quality attribute targets in Table 3.11-1 or achievement of the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX."</p> <p>For the purpose of this relief the submitter has produced a 10-year Sub-catchment Load Target Table (Schedule 1C Table XX) and attached it to proposed relief as part of a new Schedule 1C. As an alternative where it is mentioned in this submission, it could be inserted as a new part of Table 3.11-1</p>	Neutral	Support the inclusion of limits for sub-catchments where these are no higher than the current contaminant levels in that particular sub-catchment along with a clear directive that existing levels are shall not increase.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-10052	AMEND Policy 3 to read: <p>d. A 10% decrease in the diffuse discharge of nitrogen and a tailored reduction of no more than 5% through the implementation of Best or Good Management Practices in the diffuse discharge of nitrogen, phosphorus, and sediment is achieved across the sector through the while recognising:</p>	Oppose	Do not support a loosening of the discharge reduction target as this could impact on the ability to achieve the short-term and long terms water quality targets.

Mercury NZ Limited (submitter ID 73182)

Plan Section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12838	AMEND Policy 2 (e) to read: "e. Requiring stock exclusion from <u>rivers, streams, drains, wetlands and lakes</u> to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026."	Support	Support strengthening of provisions relating to lakes and wetlands.

Plan Section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Policy 13: Point sources consent duration	PC1-9577	AMEND Policy 13 to read: "When determining an appropriate duration for any consent granted <u>for point source discharges</u> , consider the following matters:..."	Oppose	Retain Policy 13 as originally intended to cover any consent granted.
3.11.4.10 Accounting system and monitoring	PC1-9594	AMEND Method 3.11.4.10 (a)(ii) to read: "ii. additional monitoring sites in sub-catchments and on tributaries that are currently unrepresented in the existing monitoring network; and..." AND AMEND Method 3.11.4.10 (b) to read: "Using the information...Table 3.11-1...." AND ADOPT representative FMU monitoring sites at, or very near, the downstream boundary of an FMU to monitor the progress toward water quality objectives over the next 80 years AND AMEND Map 3.11-1 OR ADD another map or table that identifies the location of FMU water quality monitoring sites.	Support	Support strengthening monitoring and data collection.
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-9596	AMEND Method 3.1.4.11 (a) and (e) to read: "a. Review and report on the progress towards and achievement of the 80-year water quality objectives of Chapter 3.11 every <u>5 years</u> ... e. Work with industry to collate information on the functioning and success of any Certified industry Sector Scheme."	Support	Support strengthening monitoring and data collection. This could include a timeframe for review and reporting on progress towards, and achievement of the 80- year water quality objectives of Chapter 3.11.
Table 3.11-2: List of sub-catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments	PC1-9680	ADD to Table 3.11-2 an explanatory note to confirm that Lakes Freshwater Management Units are included in sub-catchment areas.	Support	Support strengthening of provisions relating to lakes and wetlands.
River and Lake bed structures	PC1-9694	AMEND Consequential amendments to River and Lake bed structures 4.2.10.1 (n) to read: "The structure shall be consistent with the provisions specified in the Water Management Classes in Section 3.2.4 of this Plan. and in the case of the Waikato and Waipā river catchments, the relevant water quality objective in chapter 3.11. "	Oppose	Retain the proposed water quality objectives in the case of the Waikato and Waipaa River catchments.

New Zealand Forest Owners Association Inc. (submitter ID 75324)

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-9956	AMEND Policy 4 to enable low discharge land uses such as forestry. Ensure that mitigation actions are applied to all farming activities taking into account relative contributions and risk. AND MAKE any consequential amendments.	Oppose	Oppose amendments to Policy 4 – seek that forestry provisions remain as drafted.
Policy 6: Restricting land use change	PC1-9957	DELETE Policy 6 AND MAKE any consequential amendments.	Oppose	Does not align with the Vision and Strategy.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-9959	REPLACE Rule 3.11.5.3 with appropriate rules to address those activities that are contributing most to water quality degradation. AND any consequential amendments.	Oppose	Supports the PC1 permitted rules as drafted.

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-9961	DELETE reference to Nitrogen Reference Points as a method for assessing compliance AND any consequential amendments.	Oppose	Support the use of Nitrogen Reference Points as a method for assessing compliance.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9962	DELETE Rule 3.11.5.7. AND REPLACE it with robust Best Practical Option based rules that require those causing the adverse effects associated with their activities to avoid, remedy or mitigate those activities. AND make any consequential amendments.	Oppose	Support the provisions in PC1 including the offsetting provisions.

The Royal Forest and Bird Protection Society (submitter 74122)

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-8256	AMEND Policy 4 to read as follows: "Manage sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, and enable existing and new low discharging activities to continue provided that cumulatively the achievement of Objective 3 is not compromised provided there is no increase in diffuse discharges nitrogen, phosphorus, sediment and microbial pathogens."	Support	Support strengthening provisions to include clear direction that there should be no increase in contaminant levels
Policy 5: Staged approach	PC1-8257	AMEND Policy 5 to read: "Recognise that achieving the water quality attribute targets set out in Table 3.11-1 will need to be staged over 80 years to minimise social disruption and allow for innovation and new practices to develop, while making a start on reducing discharges of nitrogen, phosphorus, sediment and microbial pathogens, and preparing for further reductions that will be required in subsequent regional plans 35 years, requiring reductions immediately, and additional reduction in the medium to long term where these are necessary to achieve the targets."	Neutral	WRA recognises that the restoration of the Waikato and Waipaa Rivers will be intergenerational, that the methods and tools to meet the targets may not yet exist, and that there is a lag period where historic or current contaminant losses are yet to be exhibited in the river
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-8264	REMOVE 'toxic' from Policy 11(a), AND REMOVE all reference to offsets from Policy 11, including the second sentence and clauses (b), (c) and (d).	Oppose	WRA supports the use of offsets as a tool for achieving a net contaminant loss improvement
Policy 13: Point sources consent duration	PC1-8325	AMEND Policy 13 to read as follows: "Policy 13: Point sources consent duration. When determining an appropriate duration for any consent granted consider the following matters: a. A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policies 11 and 12 will be met; and whether the applicant demonstrates that the discharge is consistent with the water quality attribute targets set out in Table 3.11-1; b. the magnitude and significance of the investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality; and	Oppose	Seek to retain reference to consent terms only exceeding 25-years where the approaches in Policy 11 and 12 are met

Plan section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
		c. the need to provide appropriate certainty of investment where contaminant reduction measures are proposed (including investment in treatment plant upgrades or land based application technology)."		
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-8336	DELETE Policy 16.	Oppose	Policy 16 recognises the effect historic barriers to development of taangata whenua ancestral lands and retention of this policy for land that has been returned or may be returned in the future
Definition - Offset	PC1-8719	DELETE the definition for offset/s.	Oppose	WRA supports the use of offsets as a tool for achieving a net contaminant loss improvement

Waikato District Council (submitter ID 73418)

Plan Section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3118	AMEND Rule 3.11.5.7 with options below (or similar) <u>"is a permitted activity where</u> <u>a) an environmental farm plan is in place, and amendments are undertaken to the plan to encompass the changes in land use by a Certified Farm Environment Planner,;</u> <u>b) Waikato Regional Council are notified 30 days prior to the land use change being initiated. Or otherwise is a restricted discretionary non-complying activity (requiring resource consent)"</u>	Oppose	Retain Rule 3.11.5.7 as originally proposed in order to give effect to the Vision and Strategy.
Schedule C - Stock exclusion	PC1-3116	AMEND Schedule C, with the following, or similarly intended wording. Exclusions: The following situations are excluded from clauses 1 and 2 <u>"(III) where the stocking rate is low (less than 18 SU per ha) and:</u> <u>-the costs of exclusion are high,</u> <u>and; -other mitigation actions are taken, as approved by a Certified Farm Environment Planner"</u>	Oppose	WRA supports the stock exclusion policies from rivers and streams set out in PC1 as notified and seeks to include greater setbacks for lakes and wetlands

Waikato Regional Council (submitter ID 72890)

Plan Section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
Map 3.11-1: Map of the Waikato and Waipaa River catchments, showing Freshwater Management Units	PC1-3649	AMEND Map 3.11-1 to correct possible inconsistencies with lake mapping and classification of Lake Freshwater Management Unit^ types. AND ADD an additional map at a scale sufficient to accurately map and name all Lake Freshwater Management Unit^. AND AMEND the legend to clarify the Freshwater Management Unit^ status of the waterbodies shown in light blue.	Support	Support strengthening of maps relating to lakes.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to	PC1-3062	AMEND Policy 11 so that flood management and drainage infrastructure are not required to mitigate contaminants that are sourced from land use activities within catchment.	Support	This is a reasonable amendment. Flood/drainage infrastructure should mitigate contaminants caused by that infrastructure, but

Plan Section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
point source discharges				not necessarily contaminants from the catchment they are controlling.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12545	AND AMEND Schedule 1 Clause 2(f)(ii)(d) to read: "maintaining appropriate buffers between cultivated areas and water bodies (minimum 5m setback <u>or a lesser distance greater than 1m with appropriate mitigation measures specified in the Farm Environment Plan</u>).	Oppose	Weakens the intent of the setback rules and protection of the waterways. Retain Schedule 1 - Requirements for Farm Environment Plans as proposed.

Watercare Services Ltd (submitter ID 74077)

Plan Section	Submission point ID	Relevant decision sought by original submitter	Support/ Oppose	Reason
3.11.2 Objectives	PC1-8450	AMEND PPC1 objectives and policies so they are RMA statutory plan objectives and policies and reflect best practice RMA plan drafting.	Oppose	Retain Objectives as originally proposed or at least ensure that original intent is not altered during re-drafting.
3.11.3 Policies	PC1-8455	AMEND PPC1 objectives and policies so they are RMA statutory plan objectives and policies and reflect best practice RMA plan drafting.	Oppose	Retain Objectives as originally proposed or at least ensure that original intent is not altered during re-drafting.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-8122	RETAIN Policy 11. AND AMEND to be consistent with the RMA by relating the requirements for Best Practical Option to consideration of options to determine the best practicable one to prevent or minimise adverse effects. AND AMEND to be consistent with the RMA by relating the requirements for offsetting to residual effects that are significant adverse effects. AND AMEND to reflect best practice RMA policy drafting. AND AMEND to split into a Best Practical Option Policy and an offsetting policy.	Oppose	Retain Policy 11 as originally proposed.