

**FURTHER SUBMISSION BY THE WAIKATO AND WAIPĀ RIVER IWI ON
HEALTHY RIVERS/WAI ORA: PROPOSED WAIKATO REGIONAL PLAN
CHANGE 1 AND VARIATION 1**

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Name of Submitter Waikato Raupatu River Trust,
Maniapoto Māori Trust Board,
Raukawa Charitable Trust,
Te Arawa River Iwi Trust and
Tūwharetoa Māori Trust Board,

jointly as the Waikato and Waipā River Iwi.

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Waikato Raupatu River Trust, Maniapoto Māori Trust Board, Raukawa Charitable Trust, Te Arawa River Iwi Trust and Tūwharetoa Māori Trust Board wish to be heard in support of this submission at any hearing.

If other parties make similar submissions, Waikato Raupatu River Trust, Maniapoto Māori Trust Board, Raukawa Charitable Trust, Te Arawa River Iwi Trust and Tūwharetoa Māori Trust Board may be prepared to present a joint case at any hearing.

JOINT FURTHER SUBMISSION

1. This further submission is made jointly by the River Iwi in relation to the Healthy Rivers/Wai Ora: Proposed Waikato Regional Plan Change 1 (**Proposed Plan Change 1**) and Variation 1 to Proposed Plan Change 1 (**Variation 1**).

THE WAIKATO AND WAIPĀ RIVER IWI

2. The Waikato and Waipā River Iwi are:
 - (a) Waikato-Tainui, as represented by the Waikato Raupatu River Trust;
 - (b) Ngāti Maniapoto, as represented by the Maniapoto Māori Trust Board;
 - (c) Raukawa, as represented by the Raukawa Charitable Trust;
 - (d) the Te Arawa River Iwi, as represented by the Te Arawa River Iwi Trust; and
 - (e) Ngāti Tūwharetoa, as represented by the Tūwharetoa Māori Trust Board.
3. The River Iwi are co-governors of the Waikato and Waipā Rivers, as reflected in legislation relating to the co-management of the Waikato and Waipā Rivers. Those Acts of Parliament are the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010, the Ngāti Tuwharetoa, Raukawa, and Te Arawa River Iwi Waikato River Act 2010, and the Nga Wai o Maniapoto (Waipa River) Act 2012 (together, the **River Acts**).

JOINT SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1

4. The River Iwi made joint submissions on Proposed Plan Change 1 and Variation 1. Each of those joint submissions set out:
 - (a) an opening statement for the River Iwi;
 - (b) the statutory provisions on which the River Iwi rely to participate in this process; and
 - (c) the participation of the River Iwi in the Healthy Rivers Wai Ora Committee (the **HRWOC**).
5. The River Iwi repeat those preliminary points for the purpose of this joint further submission.
6. The River Iwi observe that a number of submissions on Variation 1 did not relate directly to Variation 1, and instead sought to make further submissions on Proposed Plan Change 1. These submissions are out of date, or otherwise out of scope in relation to Variation 1. The River Iwi have not responded to these submissions on the basis that they are out of date and/or out of scope. The River Iwi reserve their position on these submissions.

JOINT RECOMMENDATIONS

7. As a result of the operation of the HRWOC, each of the Waikato and Waipā River Iwi

was able to recommend that the WRC publicly notify the Proposed Plan Change 1 and Variation 1. Accordingly, each of the Waikato and Waipā River Iwi individually decided with the WRC (jointly) on the final recommendation to the WRC on the content of Proposed Plan Change 1 and Variation 1.

8. Although each of the Waikato and Waipā River Iwi decided jointly with the WRC on the final recommendation to the WRC on the content of Proposed Plan Change 1 and Variation 1, each of the Waikato and Waipā River Iwi did so expressly on the following basis:
 - (a) Each of the Waikato and Waipā River Iwi expressly reserved the right to make submissions (whether collectively with other River Iwi or individually) on any aspects of Proposed Plan Change 1 and Variation 1.
 - (b) The Waikato and Waipā River Iwi have the right to participate in the Resource Management Act 1991 (**RMA**) Schedule 1 process and would do so in relation to Proposed Plan Change 1 and Variation 1.
 - (c) Each of the Waikato and Waipā River Iwi made individual decisions regarding the final recommendation to the WRC on the content of Proposed Plan Change 1 and Variation 1.
 - (d) Each of the Waikato and Waipā River Iwi may wish to advance particular issues through the RMA Schedule 1 process.
9. This further submission is made jointly by the River Iwi. However, each of the Waikato and Waipā River Iwi:
 - (a) may make individual further submissions on any submission, in addition to this joint further submission; and
 - (b) may individually appeal decisions on Proposed Plan Change 1 and/or Variation 1, including in relation to any submissions made in this joint further submission.

TE TURE WHAIMANA

10. Te Ture Whaimana is the primary direction setting document for the restoration and protection of the Waikato and Waipā Rivers. Te Ture Whaimana is a fundamental element of the settlement and co-management agreements River Iwi have signed with the Crown, and reflected in legislation.
11. The Waikato and Waipā River Iwi are committed to the long-term objectives set out in Te Ture Whaimana, particularly the restoration of water quality within the Waikato and Waipā Rivers so that it is safe for people to swim in and take food from over its entire length.
12. The Waikato and Waipā River Iwi acknowledge and accept that achievement of the long-term objectives will take time, and that the measures set out in Proposed Plan Change 1 (as varied by Variation 1) are the first, important steps to assist with achieving those objectives. The Waikato and Waipā River Iwi therefore support a staged approach — advanced through Proposed Plan Change 1 and Variation 1 — to

the achievement of the long-term objectives set out in Te Ture Whaimana.

13. Te Ture Whaimana (and its long-term focus) has significant status and weighting in the RMA planning hierarchy. It is deemed to be part of the Waikato Regional Policy Statement. It overrides any National Policy Statement, including the National Policy Statement for Freshwater Management. It cannot be reviewed by the WRC (which overrides section 79 of the RMA). The WRC must give effect to Te Ture Whaimana in the Regional Plan. In order to give effect to Te Ture Whaimana, Proposed Plan Change 1 and Variation 1 must necessarily reflect and provide for long-term objectives.
14. Accordingly, the Waikato and Waipā River Iwi support Proposed Plan Change 1 and Variation 1 in relation to the manner in which it seeks to give effect to the long-term objectives set out in Te Ture Whaimana. Proposed Plan Change 1 (as varied by Variation 1) is one of the instruments by which settlement and co-management agreements between Waikato and Waipā River Iwi and the Crown are being implemented and this should be recognised in consideration of this submission.

SPECIFIC POINTS OF FURTHER SUBMISSION

15. Refer to attached Table 1.

Table 1

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
General				
General	PC1-11373	Ata Rangi 2015 Limited Partnership	Oppose	River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The River Iwi are comfortable with the CSG articulation of Te Ture Whaimana being expressed through the Section 32 report as Scenario 1.
General	PC1-10790	Auckland/Waikato Fish and Game	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The proposed new objective for ecosystem health replicates the NPS-FM 2017 and while an important consideration, Objective 1 (to achieve Te Ture Whaimana in 80-years) sets a higher benchmark.</p> <p>The proposed amendment to insert a new objective to identify, classify, maintain and enhance wetlands is supported by River Iwi. The River Iwi note is it probable that new wetlands (edge of field mitigations) are likely to be created as a result of implementing PC1, however more work is required to identify existing wetlands —other than Whangamarino— to ensure what wetland habitat remains is not further lost. The River Iwi consider this could form a new method in PC1.</p> <p>In respect of new Schedule D, the River Iwi consider that a planted riparian margin has immense benefits for ecological health, especially on small streams – the smaller the stream the greater the benefits of riparian planting/shading. However, the application of a flat buffer or setback distance of 2, 5 or 10 metres is a blunt instrument and may be a wasted opportunity. Instead, to capture contaminants, careful design of the riparian buffer is required. As little as 1 metre from the stream bank may be appropriate in places, and 10-15-20 metres in other places (typically low points where the runoff and seepage flows concentrate). The River Iwi therefore consider that it is important to retain flexibility to encourage adoption of best design practices and support the adoption of an average planted buffer width (which would allow variable width to follow the terrain and intercept contaminant pathways) and non-regulatory methods to encourage riparian planting programmes that adopt best design practices and for the regional council to fund planting programmes and provide advice. In this regard new Schedule D is not required.</p> <p>The River Iwi are satisfied the best available science information suggests 10% of the journey towards Te Ture Whaimana is an achievable in 10-years —Objective 3—. While River Iwi would support the rate of change being increased, the viability of new Schedule E needs to be worked through caucusing with technical experts.</p>
General	PC1-4790	Bailey, James	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-11398	Balle Bros Group	Oppose	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. Amendments proposed to delete the objectives of PC1 are opposed by the River Iwi.
General	PC1-11398	Balance Agri-Nutrients Limited	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-11150	Beef + Lamb New Zealand Limited	Support in Part	River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The River Iwi are comfortable the long-term and short-term freshwater objectives are based on the mix of values expressed in 3.11.1, including the consumptive values ascribed to Mana Tangata.

Table 1

				<p>River Iwi do not support nor oppose the split of Table 3-11-1 to separate out freshwater “objectives” (chlorophyll a, clarity and E.coli) from limits and targets (total nitrogen, total phosphorus, nitrate and ammonia). Whilst this change might improve consistency with the wording of the NPSFM, it is unclear how this change benefits effective catchment management.</p> <p>River Iwi /support a clear identification of which sub-catchments and FMU currently meet the short and long-term water quality attribute “targets” for total nitrogen, total phosphorus, nitrate and ammonia (these “numbers” should be “limits”), and those that don’t (these “numbers” should be “targets”). A table summarising the current state of water quality at each sub-catchment/FMU monitoring site may also assist the reader.</p> <p>The River Iwi continue to support the definition of objectives in relation to the range of Intrinsic and Use Values identified in PC1 and does not oppose in principle the inclusion of additional attributes, should these improve management of the catchment for the achievement of Te Ture Whaimana. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings.</p> <p>The definition of additional numerical objectives for the attributes suggested in the submission would need to ensure that they are:</p> <ul style="list-style-type: none"> • Within scope of PC1 • Relevant to the waterbody type(s) in each sub-catchment; • At a level that ensures long-term restoration and protection of ecosystem health • Realistic and achievable, having regard to the natural characteristics and current state of each water body <p>The definition and inclusion in PC1 of nitrogen and phosphorus limits expressed as loads may be a useful management but may be best developed as part of the nutrient allocation framework (Policy 7).</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (eg, edge of field mitigations etc). In terms of mechanisms, joint solutions such as catchment collectives/committees and community action groups that achieve the same outcomes as intended by Objective 3 of PC1 are broadly supported by the River Iwi.</p> <p>PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM. The River Iwi consider the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p> <p>Amendments to strengthen the intent of PC1 in achieving Te Ture Whaimana in 80-years (by 2096) are supported by River Iwi.</p>
General	PC1-12324	BT Mining Ltd	Oppose	<p>River Iwi consider the suggested use of the term “best practicable option” as opposed to “best management practice” and “good management practice” for farming activities, assumes those activities should be treated as point source discharges. The application “best practicable option” applies largely to the management of point source discharges and PC1 was never</p>

Table 1

				geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges. Notwithstanding the argument that “best practicable option” may not equate to Te Ture Whaimana in 80-years (by 2096), the use of the “best practicable option” by land owners on such a scale (and then the assessment required by WRC on a consent by consent basis) may not be feasible. River Iwi oppose this amendment.
General	PC1-12324	Buckley, Peter Ross	Support	The River Iwi support the reintroduction of Objective 6 and Policy 15
General	PC1-6373	Cameron, Bruce	Support	The River Iwi support the reintroduction of Objective 6 and Policy 15
General	PC1-7808	Charion Investment Trust	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-10159	Dairy NZ	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-10521	Department of Conservation	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-4237	Eel Enhancement Company Limited	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipā Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.
General	PC1-1060	Eight Mile Famrs Ltd	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipā Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.
General	PC1-10862	Federated Farmers of New Zealand	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-9132	Fletcher Trust	Oppose	The proposed deletion of OVERSEER is opposed by River Iwi.
General	PC1-10451	Fonterra Co-operative Group Ltd	Support in Part	The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM. The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.
General	PC1-10737	Fulton Hogan Limited	Support in Part	The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.

Table 1

				The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.
General	PC1-2859	GBC Winstone	Support in Part	<p>The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.</p>
General	PC1-6297	Gleeson, Graeme B	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-9855	Hamilton, Malibu	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. The River Iwi are comfortable the trajectory of water quality improvement will assist with improving ecosystem in the Waikato and Waipā River catchments. However, River Iwi would support strengthening of policies and methods to ensure the habitat of indigenous species are safeguarded.</p> <p>The River Iwi continue to support the definition of objectives in relation to the range of Intrinsic and Use Values identified in PC1 and does not oppose in principle the inclusion of additional attributes, should these improve management of the catchment for the achievement of Te Ture Whaimana. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings.</p> <p>The definition of additional numerical objectives for the attributes suggested in the submission would need to ensure that they are:</p> <ul style="list-style-type: none"> • Within scope of PC1 • Relevant to the waterbody type(s) in each sub-catchment; • At a level that ensures long-term restoration and protection of ecosystem health • Realistic and achievable, having regard to the natural characteristics and current state of each water body <p>The definition and inclusion in PC1 of nitrogen and phosphorus limits expressed as loads may be a useful management but may be best developed as part of the nutrient allocation framework (Policy 7).</p> <p>The River Iwi agree that measurement and monitoring of progress towards achieving Objective 1 and 3 in PC1 are pivotal. Amendments to strengthen existing methods for monitoring PC1 (including plan effectiveness monitoring and the design and commissioning of the accounting framework) are support by River Iwi. The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of PC1 and will ultimately inform future management decisions (including monitoring/measuring change).</p>

Table 1

				<p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p> <p>River Iwi agree that new objectives is required to provide for the restoration and protection of the Whangamarino Wetland, Lake Waikare (including specific objectives for Lakes FMU) and methods to identify and protect existing wetlands in the Waikato and Waipā River catchments.</p>
General	PC1-4293	Hamilton Residents & Ratepayers Association Inc	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipā Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.
General	PC1-5368	Hancock Forest Management (NZ) Ltd	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community.</p> <p>River Iwi consider the suggested use of the term “best practicable option” as opposed to “best management practice” and “good management practice” for farming activities, assumes those activities should be treated as point source discharges. The application “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges. Notwithstanding the argument that “best practicable option” may not equate to Te Ture Whaimana in 80-years (by 2096), the use of the “best practicable option” by land owners on such a scale (and then the assessment required by WRC on a consent by consent basis) may not be feasible. River Iwi oppose this amendment.</p> <p>PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM. The River Iwi consider the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>Amendments to objectives that fundamentally strengthen PC1 and the outcome of achieving Te Ture Whaimana by 2096 are supported by the River Iwi.</p>
General	PC1-1666	Hennebry, Jane	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipā Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.
General	PC1-7629	Hill Country Farmers Group	Support	The River Iwi support the reintroduction of Objective 6 and Policy 15
General	PC1-4566	Holmes, Gavin	Support	The River Iwi support the reintroduction of Objective 6 and Policy 15

Table 1

General	PC1-9899	Horticulture New Zealand (HortNZ)	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-6402	J Swap Ltd	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-12327	Jefferis, Daniel	Support	The River Iwi support the reintroduction of Objective 6 and Policy 15
General	PC1-1467	Jivan Produce Ltd	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipā Rivers) and the National Policy Statement for Freshwater Management 2017. Putting PC1 on hold, whether temporarily or permanently, is fundamentally opposed by the River Iwi.
General	PC1-6634	Jodean Farms	Support in Part	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community. Amendments proposed delete the objectives of PC1 are opposed by the River Iwi.
General	PC1-1773	Kilgour, Gareth	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-12323	Maraekowhai Ltd	Support in Part	River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The River Iwi are comfortable the long-term and short-term freshwater objectives are based on the mix of values expressed in 3.11.1, including the consumptive values ascribed to Mana Tangata. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (eg, edge of field mitigations etc). In terms of mechanisms, joint solutions such as catchment collectives/committees and community action groups that achieve the same outcomes as intended by Objective 3 of PC1 are supported by the River Iwi.
General	PC1-3462	Matamata-Piako District Council	Oppose	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096). Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.
General	PC1-7629	Maungatautari Marae	Support	The River Iwi broadly support the matters set out in the submission and the relief sought.
General	PC1-8311	McGovern, Annette	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-8311	Mercury NZ Limited	Oppose	Achieving Te Ture Whaimana is paramount. The continued operation and productive output of the Waikato Hydro Scheme is secondary to the health and wellbeing of the Waikato and Waipā Rivers.

Table 1

General	PC1-11072	Moss, George Wilder	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-6880	Muir, Mark	Support	The River Iwi support the reintroduction of Objective 6 and Policy 15
General	PC1-11293	Ngaati Tamaoho Trust Te Taiao Roopuu	Support	The River Iwi broadly support the matters set out in the submission and the relief sought.
General	PC1-11299	Ngati Haua Iwi Trust	Support	The River Iwi broadly support the matters set out in the submission and the relief sought.
General	PC1-6001	NZ Forest Managers Ltd	Oppose	PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits for longer than 10-years. Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.
General	PC1-4836	NZ Transport Agency	Support	The River Iwi support the reintroduction of Objective 6 and Policy 15
General	PC1-6708	Oji Fibre Solutions (NZ) Limited	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-8167	Otorohaunga District Council	Oppose	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096). Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.
General	PC1-5751	Pamu Farms of new Zealand	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-10899	Poohara Marae	Support	The River Iwi broadly support the matters set out in the submission and the relief sought.
General	PC1-11295	Potini Whaanau	Support	The River Iwi broadly support the matters set out in the submission and the relief sought.
General	PC1-11140	Primary Land Users Group	Not stated	Refer to responses to “itemised” further submissions on sections of PC1

Table 1

General	PC1-7764	Pukekohe Vegetable Growers Association Inc (PVGA)	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-5962	Rotor Work Limited	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-5586	Save Lake Karapiro Inc	Oppose	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits for longer than 10-years.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p>
General	PC1-3759	South Waikato District Council	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>
General	PC1-5175	Stark, Stephen and Theresa	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-5563	Strang and Strang Limited	Oppose	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits for longer than 10-years.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p>
General	PC1-10883	Te Awamaarahi Marae Trustees	Support	The River Iwi broadly support the matters set out in the submission and the relief sought.

Table 1

General	PC1-11294	Te Kauri Marae	Support	The River Iwi broadly support the matters set out in the submission and the relief sought.
General	PC1-10891	Te Taniwha o Waikato	Support	The River Iwi broadly support the matters set out in the submission and the relief sought.
General	PC1-5854	Thames-Coromandel District Council	Oppose	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096). Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.
General	PC1-8188	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-10889	Turangawaewae Marae	Support	The River Iwi broadly support the matters set out in the submission and the relief sought.
General	PC1-6779	Twining, Murray Ian and Robyn Joy	Support	The River Iwi support the reintroduction of Objective 6 and Policy 15
General	PC1-1269	Verkerk, Gwyneth	Support	The River Iwi broadly support the matters set out in the submission and the relief sought.
General	PC1-10897	Waahi Pa Marae Committee	Support	The River Iwi broadly support the matters set out in the submission and the relief sought.
General	PC1-10896	Waahi Whaanui Trust	Support	The River Iwi broadly support the matters set out in the submission and the relief sought.
General	PC1-11068	Waikato Dairy Leaders Group	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-3140	Waikato District Council	Oppose	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096). Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.

Table 1

General	PC1-6228	Waikato Environment Centre	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits for longer than 10-years.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p>
General	PC1-11566	Waikato Regional Council	Support in Part	<p>The River Iwi support the use of macrons for Waipā River and lower case for mātauranga.</p> <p>The River Iwi adopt a cautious approach to language used by the submitter in “clarify the wording” regarding how discharges are managed. For example, the River Iwi are clear, the use of discharge permits to establish (and lock in) rights to discharge any or all of the four contaminants for durations longer than 10-years —and ahead of future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4) post 2026— are opposed. The risk of locking in existing rights to discharge the four contaminants for between longer than 10-years (and avoidance of making further signalled reductions post 2026) is carried by the Waikato and Waipā Rivers.</p> <p>The River Iwi request to be involved in any matters relating to the design of consenting (whether land use or discharge permit) that establish (and lock in) rights to discharge any or all of the four contaminants.</p>
General	PC1-11566	Waikato River Authority	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-4689	Waipapa Farms Ltd and Carlyle Holdings Ltd	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives.</p> <p>The science information that underpins the CSG design of PC1 (particularly the 80-year timeframe to achieve Te Ture Whaimana) considered the historical use of land and the lag time of key contaminants in reaching waterbodies.</p>
General	PC1-11566	Wairakei Pastoral Ltd	Support in Part	<p>The River Iwi consider that PC1 is an adaptive response to a long-term water quality target (being Te Ture Whaimana) in 2096. It is unclear how new Schedule 3 adds any value to PC1 aside from re-stating key objectives and policies in a slightly different way and potentially diluting the intent of PC1.</p> <p>The River Iwi note they support sub-catchment planning and the use of catchment collectives —using catchment based planning— as one mechanism to achieve improved water quality outcomes at a greater scale than might be possible using singular farm environment plans. Sub-catchment based planning (new schedule 2) and catchment collectives need to</p>

Table 1

				<p>demonstrate that water quality improvements will occur through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p> <p>While the introduction of collective and sub-catchment groups to achieve demonstrable water quality improvements at scale is supported by River Iwi, the addition of new Schedule 2 is opposed by River Iwi. PC1 establishes a pathway for properties and enterprises that are not low intensity activities to either develop Farm Environment Plans or be part of a Certified Industry Scheme. The River Iwi consider there is a risk Schedule 2 —that are different than catchment planning— will create loopholes for properties and enterprises to avoid reducing the discharge of contaminants to assist with achieving Objective 3 (by 2026) and ultimately Te Ture Whaimana (by 20956), through wording that is not consistent with the Vision and Strategy and dilutes the intent of PC1.</p> <p>The River Iwi could support framing (new Schedule 4) of how mitigation measures are to be articulated as conditions of land use resource consents and links between accounting framework and any modelling work that is undertaken to establish the validity of mitigation measures at a sub-catchment scale.</p> <p>The River Iwi request to be involved in any technical discussions to design any new schedules around mitigation measures, sub-catchment planning and adaptive management (if these progress to caucus).</p>
General	PC1-8454	Watercare Services Ltd	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
General	PC1-11558	Yule, Don, Lauris and Yvette	Support	The River Iwi support the reintroduction of Objective 6 and Policy 15

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Background and explanation				
Background	PC1-4300	A S Wilcox & Sons Ltd	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096).</p> <p>Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Background	PC1-11362	Bale Bros Group	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096).</p>

Table 1

				Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.
Background	PC1-5494	Chhagn Bros Co Ltd	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096).</p> <p>Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Background	PC1-3595	GBC Winstone	Support in Part	<p>The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported.</p> <p>However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.</p>
Background	PC1-10061	Hamilton City Council	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Providing additional time to achieve the 10-year (by 2026) short-term freshwater objective is not supported by the River Iwi. Further delays and inaction will not protect nor restore the Waikato and Waipā Rivers so that it is safe for people to swim in and take food from over its entire length.</p>
Background	PC1-3975	Hira Bhana and Co Ltd	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096).</p> <p>Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Background	PC1-9897	Horticulture New Zealand (HortNZ)	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p>

Table 1

				<p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096). Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Background	PC1-1326	Jivan Produce Ltd	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096). Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Background	PC1-5270	Living Foods Ltd	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096). Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Background	PC1-4988	Makan Daya & Co Ltd	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096). Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Background	PC1-4179	Perfect Produce Co Ltd	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096). Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Background	PC1-7766	Pukekohe Vegetable Growers Association Inc (PVGA)	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p>

Table 1

				<p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096). Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Background	PC1-10061	Rotorua Lakes Council	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Providing additional time to achieve the 10-year (by 2026) short-term freshwater objective is not supported by the River Iwi. Further delays and inaction will not protect nor restore the Waikato and Waipā Rivers so that it is safe for people to swim in and take food from over its entire length.</p>
Background	PC1-2230	Ryan Farms Ltd	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096). Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Background	PC1-1276	ST Growers Ltd	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096). Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Background	PC1-7030	Sutherland Produce Ltd	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096). Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Background	PC1-8831	Wiremu Trust	Support in Part	<p>Decreasing the size of existing FMUs and Identifying sub-catchments as FMUs has future appeal. There would be benefits in reducing the scope of the implicit averaging approach adopted by Objective A2 of the NPS-FM by scaling down the size of each FMU, and the quality of information from land use at the sub-catchment scale would be high.</p>

Table 1

				At this time, there needs to be a balance in effort between administrative management (ie, the scale of management), what is measured/monitored (as opposed to being modelled) and ensuring mitigation measures are out in place on land to achieve the short-term freshwater objective by 2026.
Background	PC1-2229	Wai Sheng Ltd	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096).</p> <p>Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
3.11 Waikato and Waipā River Catchments/Ngā Riu o ngā Awa o Waikato me Waipā				
3.11 - catchments	PC1-10465	Department of Conservation	Support in Part	The River Iwi support the identification of the Lakes FMU and contends that WRC needs to be proactive in managing improvements (restore and protect) the water quality of the four lake types within the Lakes FMU.
3.11 - catchments	PC1-3590	GBC Winstone	Support in Part	<p>The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.</p>
3.11 - catchments	PC1-8742	Miraka	Support in Part	<p>The River Iwi consider identifying individual sub-catchments as FMUs has future appeal. There would be benefits in reducing the scope of the implicit averaging approach adopted by Objective A2 of the NPS-FM —by scaling down the size of each FMU— and improving the spatial scale at which freshwater is managed and improving the quality of information from land use at the sub-catchment scale.</p> <p>At this time, there needs to be a balance between what WRC —as administrators of the plan change— can realistically achieve and what is being measured/monitored (as opposed to being modelled). Ultimately, the first stage to achieving Te Ture Whaimana should be gathering robust information from the use of land —including the discharge of contaminants— and ensuring mitigation measures are out in place on land to achieve the short-term freshwater objective by 2026.</p>

Table 1

3.11 - catchments	PC-2586	Oil Companies	Oppose	All land uses are required to achieve the freshwater objectives. PC1 already includes rules for point source activities that discharge any of the four contaminants. Activities discharge other contaminants are dealt with by other sections of the regional plan.
3.11 - catchments	PC-2073	Wairarapa Moana	Support in Part	The River Iwi consider the development of land should take into account the suitability of that land to sustain a particularly farming system and oppose the deletion of (ii). However, River Iwi also acknowledge that subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Map 3.11-1: Map of the Waikato and Waipā River catchments, showing Freshwater Management Units				
3.11 – Map 3.11.1	PC1-6496	Pouakani Trust	Support in Part	The River Iwi consider identifying individual sub-catchments as FMUs has future appeal. There would be benefits in reducing the scope of the implicit averaging approach adopted by Objective A2 of the NPS-FM —by scaling down the size of each FMU— and improving the spatial scale at which freshwater is managed and improving the quality of information from land use at the sub-catchment scale. At this time, there needs to be a balance between what WRC —as administrators of the plan change— can realistically achieve and what is being measured/monitored (as opposed to being modelled). Ultimately, the first stage to achieving Te Ture Whaimana should be gathering robust information from the use of land —including the discharge of contaminants— and ensuring mitigation measures are out in place on land to achieve the short-term freshwater objective by 2026.
3.11 – Map 3.11.1	PC-11253	Wairakei Pastoral	Support in Part	The amendment to divide sub-catchment 66 into 66a and 66B is not supported by River Iwi, unless there is good hydrological rationale for creating two new sub-catchments.
3.11 – Map 3.11.1	PC-2073	Wairarapa Moana	Support in Part	The River Iwi consider identifying individual sub-catchments as FMUs has future appeal. There would be benefits in reducing the scope of the implicit averaging approach adopted by Objective A2 of the NPS-FM —by scaling down the size of each FMU— and improving the spatial scale at which freshwater is managed and improving the quality of information from land use at the sub-catchment scale. At this time, there needs to be a balance between what WRC —as administrators of the plan change— can realistically achieve and what is being measured/monitored (as opposed to being modelled). Ultimately, the first stage to achieving Te Ture Whaimana should be gathering robust information from the use of land —including the discharge of contaminants— and ensuring mitigation measures are out in place on land to achieve the short-term freshwater objective by 2026.

Table 1

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Water quality and National Policy Statement for Freshwater Management				
3.11 – Water quality and NPS-FM	PC1-11375	Balle Bros Group	Support in Part	<p>The River Iwi consider identifying individual sub-catchments as FMUs has future appeal. There would be benefits in reducing the scope of the implicit averaging approach adopted by Objective A2 of the NPS-FM —by scaling down the size of each FMU— and improving the spatial scale at which freshwater is managed and improving the quality of information from land use at the sub-catchment scale.</p> <p>At this time, there needs to be a balance between what WRC —as administrators of the plan change— can realistically achieve and what is being measured/monitored (as opposed to being modelled). Ultimately, the first stage to achieving Te Ture Whaimana should be gathering robust information from the use of land —including the discharge of contaminants— and ensuring mitigation measures are out in place on land to achieve the short-term freshwater objective by 2026.</p>
3.11 – Water quality and NPS-FM	PC1-11255	Fonterra	Support in Part	<p>The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported.</p> <p>However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.</p>
3.11 – Water quality and NPS-FM	PC1-10839	Fulton Hogan	Support in Part	<p>The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported.</p> <p>However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.</p>
3.11 – Water quality and NPS-FM	PC1-73992	GBC Winstone	Support in Part	<p>The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported.</p> <p>However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits. .</p>

Table 1

3.11 – Water quality and NPS-FM	PC-11257	Wairakei Pastoral	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The amendments to the second paragraph are not required. Given the short-term and long-term freshwater objectives and limits set by the CSG, over-allocation HAS occurred and needs to be addressed with targets and timeframes (as set out in PC1)</p>
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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Full achievement of the Vision and Strategy will be intergenerational				
3.11 – achieving V&S is intergenerational	PC1-7666	AFFCO NZ	Oppose	<p>Policy 1 deals explicitly with diffuse sources of contaminants and the suggested use of the term “best practicable option for farming activities”, assumes those activities should be treated as point source discharges. This is because the application “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges.</p> <p>Notwithstanding the argument that “best practicable option” may not equate to Te Ture Whaimana in 80-years (by 2096), the use of the “best practicable option” by land owners on such a scale (and then the assessment required by WRC on a consent by consent basis) may not be feasible. River Iwi oppose this amendment.</p>
3.11 – achieving V&S is intergenerational	PC1-11380	Bale Bros Group	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. Amendments that strengthen PC1 are supported by the River Iwi.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p> <p>The River Iwi note PC1 is predicated on a risk based approach at a sub-catchment level (Policy 9) that already envisages the development of sub-catchment scale planning (Method 5) where like-minded land owners wish to ‘group’ together. This approach should be supported.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p> <p>Amendments to PC1 that undermine achieving Te Ture Whaimana within the 80-year timeframe are opposed.</p>

Table 1

3.11 – achieving V&S is intergenerational	PC1-11146	Beef + Lamb New Zealand Limited	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. Amendments that strengthen PC1 are supported by the River Iwi.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p> <p>The River Iwi note PC1 is predicated on a risk based approach at a sub-catchment level (Policy 9) that already envisages the development of sub-catchment scale planning (Method 5) where like-minded land owners wish to ‘group’ together. This approach should be supported.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p> <p>Amendments to PC1 that undermine achieving Te Ture Whaimana within the 80-year timeframe are opposed.</p>
3.11 – achieving V&S is intergenerational	PC1-9653	Craig, Jeffery	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. Amendments to PC1 that undermine achieving Te Ture Whaimana within the 80-year timeframe are opposed.</p>
3.11 – achieving V&S is intergenerational	PC1-10164	Dairy NZ	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The amendments to replace on farm with <u>land based</u> are supported as reductions of the four contaminants will be required across all uses of land and PC1 needs to be made robust through the First Schedule process.</p>
3.11 – achieving V&S is intergenerational	PC1-638	Dunlop, Tania	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. Amendments that strengthen PC1 are supported by the River Iwi.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>

Table 1

3.11 – achieving V&S is intergenerational	PC1-10842	Fulton Hogan Limited	Support in Part	<p>The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.</p>
3.11 – achieving V&S is intergenerational	PC1-5481	Gavins Limited	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. Amendments that strengthen PC1 are supported by the River Iwi.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
3.11 – achieving V&S is intergenerational	PC1-3599	GBC Winstone	Support in Part	<p>The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.</p>
3.11 – achieving V&S is intergenerational	PC1-3209	Genetic Technology Ltd	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. Amendments that strengthen PC1 are supported by the River Iwi.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>

Table 1

3.11 – achieving V&S is intergenerational	PC1-7939	Hill Country Farmers Group	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. Amendments that strengthen PC1 are supported by the River Iwi.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of the PC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p> <p>The River Iwi note PC1 is predicated on a risk based approach at a sub-catchment level (Policy 9) that already envisages the development of sub-catchment scale planning (Method 5) where like-minded land owners wish to ‘group’ together. This approach should be supported.</p>
3.11 – achieving V&S is intergenerational	PC1-9927	Horticulture New Zealand (HortNZ)	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096).</p> <p>Primary production (including horticulture) is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
3.11 – reviewing progress to achieving V&S	PC1-8765	Miraka Limited	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4) and will be required to progress through the First Schedule process. Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p>
3.11 – achieving V&S is intergenerational	PC1-9288	Matira Sub Catchment Group	Oppose	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. Amendments to PC1 that undermine achieving Te Ture Whaimana within the 80-year timeframe are opposed.</p>
3.11 – achieving V&S is intergenerational	PC1-6196	Oji Fibre Solutions (NZ) Limited	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. Amendments that strengthen PC1 are supported by the River Iwi and those that undermine achieving Te Ture Whaimana within the 80-year timeframe are opposed.</p>

Table 1

				The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of the PC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.
3.11 – reviewing progress to achieving V&S	PC1-5847	Pamu Farms of New Zealand	Support in Part	River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. The amendments to replace on farm with <u>land based</u> are supported as reductions of the four contaminants will be required across all uses of land and resource consents need to be reviewed to ensure compliance with the long-term freshwater objectives to achieve Te Ture Whaimana in 80-years.
3.11 – achieving V&S is intergenerational	PC1-11247	Pouakani Trust	Support in Part	River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. Amendments that strengthen PC1 are supported by the River Iwi. Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.
3.11 – achieving V&S is intergenerational	PC1-6571	Wairakei Pastoral	Support in Part	River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. The amendments to replace on farm with <u>land based</u> are supported as reductions of the four contaminants will be required across all uses of land and PC1 needs to be made robust through the First Schedule process. Amendments to paragraph 8 are not supported; if an application can't meet the two gateway test for the non-complying activity rule then the application should be declined.
3.11 – achieving V&S is intergenerational	PC1-5098	Worsp Family Trust	Oppose	River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. Amendments to PC1 that undermine achieving Te Ture Whaimana within the 80-year timeframe are opposed.

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Reviewing progress toward achieving the Vision and Strategy				

Table 1

3.11.1 – Values and Uses	PC1-10849	Fulton Hogan Limited	Oppose	The River Iwi oppose the addition of the words, “and the long-term objectives developed to give effect to that document”. The section on “Full achievement of the Vision and Strategy will be intergenerational” already signals that a staged approach over 80-years will be required to achieve Te Ture Whaimana.
3.11.1 – Values and Uses	PC1-3600	GBC Winstone	Oppose	The River Iwi oppose the addition of the words, “and the long-term objectives developed to give effect to that document”. The section on “Full achievement of the Vision and Strategy will be intergenerational” already signals that a staged approach over 80-years will be required to achieve Te Ture Whaimana.
3.11 – reviewing progress to achieving V&S	PC1-8392	Hamilton, Jean	Support in Part	River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. The amendments to replace on farm with <u>land based</u> are supported as reductions of the four contaminants will be required across all uses of land and PC1 needs to be made robust through the First Schedule process.
3.11 – reviewing progress to achieving V&S	PC1-8765	Miraka Limited	Support in Part	River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. The plan change (post 2026) to put in place the next step along the journey to achieving Te Ture Whaimana will be required to progress through the First Schedule process.

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
3.11.1 Values and uses for the Waikato and Waipā Rivers/Ngā Uara me ngā Whakamahinga o ngā Awa o Waikato me Waipā				
3.11.1 – Values and Uses	PC1-11149	Beef + Lamb New Zealand Limited	Support In Part	The River Iwi supports the logic in the proposed amendments; that the short-term freshwater objective (Objective 3) must reflect the assemblage of values articulated in PC1. While PC1 needs to give effect to the NPS-FM 2017, at the same time PC1 must also give effect to Te Ture Whaimana —which prevails over the NPS-FM where there is an inconsistency—. In this regard PC1 sets out a short-term freshwater objective (to put in place mitigation measures to achieve 10% of the journey to achieve Te Ture Whaimana in 10-years) and signals a long-term freshwater objective (to achieve Te Ture Whaimana in 80-years). The River Iwi contend the “give effect” balance is more or less achieved through PC1 (notwithstanding amendments as a result of the hearings process) and the proposed objective 1A is therefore not required.
3.11.1 – Values and Uses	PC1-11258	Fonterra Co-operative Group Ltd	Support in Part	The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.

Table 1

				The River Iwi support the use of the term 'targets' to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.
3.11.1 – Values and Uses	PC1-10855	Fulton Hogan Limited	Support in Part	The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM. The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.
3.11.1 – Values and Uses	PC1-3602	GBC Winstone	Support in Part	The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM. The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.
3.11.1 – Values and Uses	PC1-7768	Hamilton City Council	Oppose	The River Iwi oppose the proposed amendments as “flood mitigation (including drainage)” is included in a specific Mana Tangata (mitigating flood hazards) value.
3.11.1 – Values and Uses	PC1-7768	Horticulture New Zealand (HortNZ)	Oppose	The River Iwi oppose the proposed amendment as horticulture and cultivation is included in a separate Mana Tangata (primary production) value.
3.11.1 – Values and Uses	PC1-8341	Watercare Services Ltd	Oppose	The national bottom lines in the NPS-FM was amended from wadable to swimmable. Notwithstanding the above, Te Ture Whaimana prevails over the NPS-FM where there is an inconsistency, therefore the short-term and long-term freshwater objectives that will achieve Te Ture Whaimana take precedence over the national bottom lines in the NPS-FM.

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Mana Atua – Intrinsic Values (history)				
3.11.1.1 – Mana Atua (Intrinsic Values - History)	PC1-8136	Department of Conservation	Support in Part	The amendments to include wetlands, lakes and the coastal environment as part of the mahinga kai value is supported. The inclusion of coastal environment and estuarine areas for mahing kai, while according to Te Ao Maori holistic view of the awa flowing into estuarine/marine environments, falls outside of the scope of PC1.

Table 1

				The River Iwi note the benefits accrued to the awa from achieving Te Ture Whaimana (through reducing contaminant discharges from land use over time) will have flow on effects to the marine environment.
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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Mana Atua – Intrinsic Values (ecosystems)				
3.11.1.1 – Mana Atua (Intrinsic Values – Ecosystems)	PC1-10768	Auckland/Waikato Fish and Game	Support in Part	The River Iwi support in part the proposal to insert a new bullet point setting out the achievement of ecosystem health.
3.11.1.1 – Mana Atua (Intrinsic Values – Ecosystems)	PC1-8139	Department of Conservation	Support in Part	The River Iwi support in part the proposal to amend bullet points to reflect the importance (and ecological benefits) of wetlands, the adverse effects of flood storage on wetlands, and the importance of ecological integrity of wetlands.

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Mana Atua – Intrinsic Values (Natural Form and Character)				
3.11.1.1 – Mana Atua (Intrinsic Values – Ecosystems)	PC1-10769	Auckland/Waikato Fish and Game	Support	The River Iwi support in part the proposed amendment to include the appearance of water (colour and clarity).
3.11.1.1 – Mana Atua (Intrinsic Values – Ecosystems)	PC1-8152	Department of Conservation	Support	The River Iwi support in part the proposed amendment 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

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Mana Tangata – Use values				

Table 1

3.11.1.2 – Mana Tangata (use values)	PC1-7768	Pukekohe Vegetable Growers Association Inc (PVGA)	Oppose	The River Iwi oppose the proposed amendment as horticulture and cultivation is included in a separate Mana Tangata (primary production) value.
3.11.1.2 – Mana Tangata (use values)	PC1-5610	Save Lake Karapiro	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p> <p>The River Iwi support amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096).</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Use values - Mahinga kai				
33.11.1.2 – Mana Tangata (Mahinga kai)	PC1-10770	Auckland/Waikato Fish and Game	Oppose	The value for Mahinga Kai is the appropriate place to provide for the gathering of fish (and other taonga species) from the Waikato and Waipa river catchment (including lakes, wetlands and all tributaries).
3.11.1.2 – Mana Tangata (Mahinga kai)	PC1-8533	Department of Conservation	Support in Part	<p>The amendments to include wetlands, lakes and the coastal environment as part of the mahinga kai value is supported. The inclusion of coastal environment and estuarine areas for mahing kai, while according to Te Ao Maori holistic view of the awa flowing into estuarine/marine environments, falls outside of the scope of PC1.</p> <p>The River Iwi note the benefits accrued to the awa from achieving Te Ture Whaimana (through reducing contaminant discharges from land use over time) will have flow on effects to the marine environment.</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Use values - Human health for recreation				
3.11.1.2 – Mana Tangata (Human Health for recreation)	PC1-10787	Auckland/Waikato Fish and Game	Oppose	The value for Mahinga Kai is the appropriate place to provide for the gathering of fish (and other taonga species) from the Waikato and Waipa river catchment (including lakes, wetlands and all tributaries).

Table 1

3.11.1.2 – Mana Tangata (Human Health for recreation)	PC1-8535	Department of Conservation	Support in Part	The amendments to include wetlands, lakes and the coastal environment as part of the human health value is supported. The inclusion of coastal environment and estuarine areas for human health, while according to Te Ao Maori holistic view of the awa flowing into estuarine/marine environments, falls outside of the scope of PC1. The River Iwi note the benefits accrued to the awa from achieving Te Ture Whaimana (through reducing contaminant discharges from land use over time) will have flow on effects to the marine environment.
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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Use values - Transport and tauranga waka				
3.11.1.2 – Mana Tangata (Transport and Tauranga waka)	PC1-8540	Department of Conservation	Support in Part	The amendments to include wetlands, as a means for navigation and transport, is supported. The inclusion of estuarine areas for navigation, while according to Te Ao Maori holistic view of the awa flowing into estuarine/marine environments, falls outside of the scope of PC1. The River Iwi note the benefits accrued to the awa from achieving Te Ture Whaimana (through reducing contaminant discharges from land use over time) will have flow on effects to the marine environment.

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Use values - Water Supply				
3.11.1.2 – Mana Tangata (water supply)	PC1-6081	Ata Rangī Partnership	Oppose	The River Iwi oppose the proposed amendments, as the “water supply” value refers to the use of water for domestic and potable supply. The River Iwi consider domestic supply, in this context, does not include industrial or commercial use. Commercial and Industrial use have their own separate Mana Tangata (commercial, municipal and industrial) value. The River Iwi consider the value of water supply for domestic supply (human sustenance) should not be confused and complicated with water allocation for industrial or commercial uses. Large scale industrial and commercial use of water should be made to obtain permits (resource consents) to abstract and use water, as opposed to connecting to domestic supply.
3.11.1.2 – Mana Tangata (water supply)	PC1-10136	Hamilton City Council	Oppose	The River Iwi oppose the proposed amendments, as the “water supply” value refers to the use of water for domestic and potable supply. The River Iwi consider domestic supply, in this context, does not include industrial or commercial use. Commercial and Industrial use have their own separate Mana Tangata (commercial, municipal and industrial) value. The River Iwi consider the value of water supply for domestic supply (human sustenance) should not be confused and complicated with water allocation for industrial or commercial uses. Large scale industrial and commercial use of water should be made to obtain permits (resource consents) to abstract and use water, as opposed to connecting to domestic supply.

Table 1

3.11.1.2 – Mana Tangata (water supply)	PC1-11086	Southern Pastures Partnership	Oppose	<p>The River Iwi oppose the proposed amendments, as the “water supply” value refers to the use of water for domestic and potable supply. The River Iwi consider domestic supply, in this context, does not include industrial or commercial use. Commercial and Industrial use have their own separate Mana Tangata (commercial, municipal and industrial) value.</p> <p>The River Iwi consider the value of water supply for domestic supply (human sustenance) should not be confused and complicated with water allocation for industrial or commercial uses. Large scale industrial and commercial use of water should be made to obtain permits (resource consents) to abstract and use water, as opposed to connecting to domestic supply.</p>
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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Use values - Commercial, municipal and industrial use				
3.11.1.2 – Mana Tangata (commercial, municipal and industrial)	PC1-6083	Ata Rangī Partnership	Oppose	<p>The proposed amendments are opposed by the River Iwi and are contrary to a Te Ao Maori perspective and do not give effect to Objective AA1 of NPS-FM 2017 —to consider and recognise Te Mana o te Wai in the management of freshwater—.</p> <p>Treating the waterbodies associated with the Waikato and Waipā River catchment as “working rivers” that can be exploited at zero cost is entirely inappropriate.</p> <p>Amending the commercial or economic development value in such a way would set up a platform to skew the short-term freshwater objectives —to put in place the necessary mitigation measures required to achieve 10% of the journey towards Te Ture Whaimana— that is to be achieved in 10-years (by 2026), and the long-term freshwater objectives to achieve Te Ture Whaimana in 80-years (by 2096).</p>
3.11.1.2 – Mana Tangata (commercial, municipal and industrial)	PC1-10152	Hamilton City Council	Oppose	<p>The proposed amendments are opposed by the River Iwi and are contrary to a Te Ao Maori perspective and do not give effect to Objective AA1 of NPS-FM 2017 —to consider and recognise Te Mana o te Wai in the management of freshwater—.</p> <p>Treating the waterbodies associated with the Waikato and Waipā River catchment as “working rivers” that can be exploited at zero cost is entirely inappropriate.</p> <p>Amending the commercial or economic development value in such a way would set up a platform to skew the short-term freshwater objectives —to put in place the necessary mitigation measures required to achieve 10% of the journey towards Te Ture Whaimana— that is to be achieved in 10-years (by 2026), and the long-term freshwater objectives to achieve Te Ture Whaimana in 80-years (by 2096).</p>
3.11.1.2 – Mana Tangata (commercial, municipal and industrial)	PC1-6316	Oji Fibre Solutions	Support in Part	<p>The River Iwi could support the proposed amendment provided the term “and requires restoration and protection” is inserted to provide a balance.</p>
3.11.1.2 – Mana Tangata (commercial,	PC1-11087	Southern Pastures Partnership	Oppose	<p>The proposed amendments are opposed by the River Iwi and are contrary to a Te Ao Maori perspective and do not give effect to Objective AA1 of NPS-FM 2017 —to consider and recognise Te Mana o te Wai in the management of freshwater—.</p>

Table 1

municipal and industrial)				<p>Treating the waterbodies associated with the Waikato and Waipā River catchment as “working rivers” that can be exploited at zero cost is entirely inappropriate.</p> <p>Amending the commercial or economic development value in such a way would set up a platform to skew the short-term freshwater objectives —to put in place the necessary mitigation measures required to achieve 10% of the journey towards Te Ture Whaimana— that is to be achieved in 10-years (by 2026), and the long-term freshwater objectives to achieve Te Ture Whaimana in 80-years (by 2096).</p>
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Table 1

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Objectives - General				
Objectives – general	PC1-10790	Auckland/Waikato Fish and Game	Support in Part	<p>The River Iwi oppose the new objective to replace Objective 1. The new wording does not reference Table 3.11-1 [to achieve Te Ture Whaimana in 80-years] and provides little guidance of what ecosystem health is.</p> <p>The proposed amendment to insert a new objective to identify, classify, maintain and enhance wetlands is supported by River Iwi. The River Iwi note is it probable that new wetlands (edge of field mitigations) are likely to be created as a result of implementing PC1, however more work is required to identify existing wetlands —other than Whangamarino— to ensure what wetland habitat remains is not further lost. The River Iwi consider this could form a new method in PC1.</p>
Objectives – general	PC1-4790	Bailey, James	Support in Part	<p>PC1 already contains objectives, policies and methods that are targeted at tailoring solutions to addressing problems at the property/enterprise-scale and (where applicable) at the sub-catchment scale. This also includes the potential use of catchment planning and edge of field mitigations at scale.</p> <p>The River Iwi agree that implementation of PC1 is critical to ensure the existing objectives, policies and methods achieve the right outcomes and are effective.</p>
Objectives – general	PC1-11150	Beef + Lamb New Zealand Limited	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The River Iwi are comfortable the long-term and short-term freshwater objectives are based on the mix of values expressed in 3.11.1, including the consumptive values ascribed to Mana Tangata.</p> <p>River Iwi do not support nor oppose the split of Table 3-11-1 to separate out freshwater “objectives” (chlorophyll a, clarity and E.coli) from limits and targets (total nitrogen, total phosphorus, nitrate and ammonia). Whilst this change might improve consistency with the wording of the NPSFM, it is unclear how this change benefits effective catchment management.</p> <p>River Iwi /support a clear identification of which sub-catchments and FMU currently meet the short and long-term water quality attribute “targets” for total nitrogen, total phosphorus, nitrate and ammonia (these “numbers” should be “limits”), and those that don’t (these “numbers” should be “targets”). A table summarising the current state of water quality at each sub-catchment/FMU monitoring site may also assist the reader.</p> <p>The River Iwi continue to support the definition of objectives in relation to the range of Intrinsic and Use Values identified in PC1 and does not oppose in principle the inclusion of additional attributes, should these improve management of the catchment for the achievement of Te Ture Whaimana. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings.</p> <p>The definition of additional numerical objectives for the attributes suggested in the submission would need to ensure that they are:</p> <ul style="list-style-type: none"> • Within scope of PC1 • Relevant to the waterbody type(s) in each sub-catchment; • At a level that ensures long-term restoration and protection of ecosystem health • Realistic and achievable, having regard to the natural characteristics and current state of each water body <p>The definition and inclusion in PC1 of nitrogen and phosphorus limits expressed as loads may be a useful management but may be best developed as part of the nutrient allocation framework (Policy 7).</p>

Table 1

				<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (eg, edge of field mitigations etc). In terms of mechanisms, joint solutions such as catchment collectives/committees and community action groups that achieve the same outcomes as intended by Objective 3 of PC1 are broadly supported by the River Iwi.</p> <p>PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM. The River Iwi consider the 'short-term' language used in the NPS-FM should not preclude (or encumber) the use of the terms such as "long term freshwater objectives", particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p> <p>Amendments to strengthen the intent of PC1 in achieving Te Ture Whaimana in 80-years (by 2096) are supported by River Iwi.</p>
Objectives – general	PC1-10521	Department of Conservation	Support in Part	<p>The River Iwi support the reintroduction of Objective 6 with amendments to read:</p> <p>"Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units. Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1."</p> <p>AND ADD Reasons for adopting Objective 6 to read: "Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years."</p> <p>The River Iwi also consider new method is required to progress catchment planning for the four types of lakes within the Lakes FMU.</p>
Objectives – general	PC1-9855	Hamilton, Malibu	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. The River Iwi are comfortable the trajectory of water quality improvement will assist with improving ecosystem in the Waikato and Waipā River catchments. However, River Iwi would support strengthening of policies and methods to ensure the habitat of indigenous species are safeguarded.</p> <p>The River Iwi continue to support the definition of objectives in relation to the range of Intrinsic and Use Values identified in PC1 and does not oppose in principle the inclusion of additional attributes, should these improve management of the catchment for the achievement of Te Ture Whaimana. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings.</p> <p>The definition of additional numerical objectives for the attributes suggested in the submission would need to ensure that they are:</p>

Table 1

				<ul style="list-style-type: none"> • Within scope of PC1 • Relevant to the waterbody type(s) in each sub-catchment; • At a level that ensures long-term restoration and protection of ecosystem health • Realistic and achievable, having regard to the natural characteristics and current state of each water body <p>The definition and inclusion in PC1 of nitrogen and phosphorus limits expressed as loads may be a useful management but may be best developed as part of the nutrient allocation framework (Policy 7).</p> <p>The River Iwi agree that measurement and monitoring of progress towards achieving Objective 1 and 3 in PC1 are pivotal. Amendments to strengthen existing methods for monitoring PC1 (including plan effectiveness monitoring and the design and commissioning of the accounting framework) are support by River Iwi. The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of PC1 and will ultimately inform future management decisions (including monitoring/measuring change).</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p> <p>River Iwi agree that new objectives is required to provide for the restoration and protection of the Whangamarino Wetland, Lake Waikare (including specific objectives for Lakes FMU) and methods to identify and protect existing wetlands in the Waikato and Waipā River catchments.</p>
Objectives – general	PC1-5368	Hancock Forest Management (NZ) Ltd	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community.</p> <p>River Iwi consider the suggested use of the term “best practicable option” as opposed to “best management practice” and “good management practice” for farming activities, assumes those activities should be treated as point source discharges. The application “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges. Notwithstanding the argument that “best practicable option” may not equate to Te Ture Whaimana in 80-years (by 2096), the use of the “best practicable option” by land owners on such a scale (and then the assessment required by WRC on a consent by consent basis) may not be feasible. River Iwi oppose this amendment.</p> <p>PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM. The River Iwi consider the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>Amendments to objectives that fundamentally strengthen PC1 and the outcome of achieving Te Ture Whaimana by 2096 are supported by the River Iwi.</p>

Table 1

Objectives – general	PC1-1773	Kilgour, Gareth	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 2 is part of a contextual balance with other objectives and does not require amendments as proposed.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p>
Objectives – general	PC1-3462	Matamata-Piako District Council	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>
Objectives – general	PC1-8311	McGovern, Annette	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 2 is part of a contextual balance with other objectives and does not require amendments as proposed.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p>
Objectives – general	PC1-6364	Oji Fibre Solutions (NZ) Limited	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community.</p>

Table 1

				<p>River Iwi consider the suggested use of the term “best practicable option” as opposed to “best management practice” and “good management practice” for farming activities, assumes those activities should be treated as point source discharges. The application “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges. Notwithstanding the argument that “best practicable option” may not equate to Te Ture Whaimana in 80-years (by 2096), the use of the “best practicable option” by land owners on such a scale (and then the assessment required by WRC on a consent by consent basis) may not be feasible. River Iwi oppose this amendment.</p> <p>PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM. The River Iwi consider the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>Amendments to objectives that fundamentally strengthen PC1 and the outcome of achieving Te Ture Whaimana by 2096 are supported by the River Iwi.</p>
Objectives – general	PC1-4029	South Waikato District Council	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>
Objectives – general	PC1-4689	Waipapa Farms Ltd and Carlyle Holdings Ltd	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives.</p> <p>The science information that underpins the CSG design of PC1 (particularly the 80-year timeframe to achieve Te Ture Whaimana) considered the historical use of land and the lag time of key contaminants in reaching waterbodies.</p>
Objectives – general	PC1-8450	Watercare Services Ltd	Oppose	<p>The River Iwi consider PC1 is consistent with the RMA and gives effect to Te Ture Whaimana and the NPS-FM 2017.</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
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Table 1

Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit/Te Whāinga 1: Te whakaoranga tauroa me te tiakanga tauroa o te kounga wai ki ia riu kōawaawa me te Wae Whakahaere i te Wai Māori				
Objective 1 – Long-term freshwater objective	PC1-9500	Advisory Committee on Regional Environment (ACRE)	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>
Objective 1 – Long-term freshwater objective	PC1-6090	Ata Rangī 2015 Limited Partnership	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>PC1 provides flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants, including the use of internal offset mitigations, that can be recorded in farm environment plans. The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>
Objective 1 – Long-term freshwater objective	PC1-10806	Auckland/Waikato Fish and Game	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The River Iwi consider Table 3.11-1 requires minor amendment to ensure the water quality targets will achieve Te Ture Whaimana in 80-years. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings.</p> <p>The River Iwi refer to the relief sought in submission points on Table 3.11-1 in respect of nitrate-nitrogen and ammoniacal nitrogen, and Table 3.11-2 in respect of Total Nitrogen, Total Phosphorus. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings</p> <p>The River Iwi support in principle the identification of appropriate sites for sub-catchment monitoring (where these sites do not currently exist or where existing sites would benefit from re-location).</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p>

Table 1

Objective 1 – Long-term freshwater objective	PC1-4782	Bailey, James	Oppose	<p>The River Iwi consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain or improve overall water quality” or “improvement”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, as opposed to being flat lined at the “national bottom line” standards set out in the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Objective 1 – Long-term freshwater objective	PC1-11386	Balle Bros Group	Oppose	<p>The River Iwi oppose inclusion of the term “maintenance” and “as relevant” and consider the amendments dilute the intent of Objective 1. The River Iwi contend PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “as relevant”.</p> <p>The River Iwi also believe the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096).</p>
Objectives – general	PC1-11150	Beef + Lamb New Zealand Limited	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The River Iwi are comfortable the long-term and short-term freshwater objectives are based on the mix of values expressed in 3.11.1, including the consumptive values ascribed to Mana Tangata.</p> <p>River Iwi do not support nor oppose the split of Table 3-11-1 to separate out freshwater “objectives” (chlorophyll a, clarity and E.coli) from limits and targets (total nitrogen, total phosphorus, nitrate and ammonia). Whilst this change might improve consistency with the wording of the NPSFM, it is unclear how this change benefits effective catchment management.</p> <p>River iwi /support a clear identification of which sub-catchments and FMU currently meet the short and long-term water quality attribute “targets” for total nitrogen, total phosphorus, nitrate and ammonia (these “numbers” should be “limits”), and those that don’t (these “numbers” should be “targets”). A table summarising the current state of water quality at each sub-catchment/FMU monitoring site may also assist the reader.</p> <p>The River Iwi consider the proposed amendments to Objective 4 are not required. Objective 2 already provides for the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p> <p>The River Iwi continue to support the definition of objectives in relation to the range of Intrinsic and Use Values identified in PC1 and does not oppose in principle the inclusion of additional attributes, should these improve management of the catchment for the achievement of Te Ture Whaimana. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings.</p>

Table 1

				<p>The definition of additional numerical objectives for the attributes suggested in the submission would need to ensure that they are:</p> <ul style="list-style-type: none"> • Within scope of PC1 • Relevant to the waterbody type(s) in each sub-catchment; • At a level that ensures long-term restoration and protection of ecosystem health • Realistic and achievable, having regard to the natural characteristics and current state of each water body <p>The definition and inclusion in PC1 of nitrogen and phosphorus limits expressed as loads may be a useful management but may be best developed as part of the nutrient allocation framework (Policy 7).</p> <p>While PC1 needs to give effect to the NPS-FM 2017, at the same time PC1 must also give effect to Te Ture Whaimana —which prevails over the NPS-FM where there is an inconsistency—. In this regard PC1 sets out a short-term freshwater objective (to put in place mitigation measures to achieve 10% of the journey to achieve Te Ture Whaimana in 10-years) and signals a long-term freshwater objective (to achieve Te Ture Whaimana in 80-years).</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (eg, edge of field mitigations etc). In terms of mechanisms, joint solutions such as catchment collectives/committees and community action groups that achieve the same outcomes as intended by Objective 3 of PC1 are broadly supported by the River Iwi.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p> <p>Amendments to strengthen the intent of PC1 in achieving Te Ture Whaimana in 80-years (by 2096) are supported by River Iwi.</p>
Objective 1 – Long-term freshwater objective	PC1-6992	Cameron, Bruce	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis. The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community.</p> <p>The River Iwi consider the effects of water quality during flood events on downstream receiving water quality should be carefully considered before high river flows are excluded from any freshwater objective(s) or limit(s). This is particularly important in the context of the Waikato River being the longest river system in New Zealand, and functioning, for a significant proportion of its course, as a series of lakes. The hydro lakes and lower river often remain swimmable even when a tributary stream may not be swimmable due to a high flow event. Nutrient, pathogen and sediment loads carried by tributaries during high flow events are, at least in part, retained in the Waikato River lakes and mainstem for sufficiently long periods of time to have effect on ecological and recreational values. The River Iwi do not support the exclusion of high flow events unless the risks to downstream water quality are understood and managed.</p>

Table 1

				Amendments proposed to delete Objective 1 and/or lengthen the timeframe to achieve Objective 1 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.
Objective 1 – Long-term freshwater objective	PC1-7591	Charion Investment Trust	Oppose	<p>The River Iwi the term the proposed amendments as they dilute the intent of Objective 1. PC1 must give effect to Te Ture Whaimana and the NPS-FM 2017. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “protect and where necessary restore”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipā River catchments, not just “where necessary”. The specific targets to achieve the short-term freshwater objectives in 10-years are reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Furthermore, the River Iwi believe the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Objective 1 – Long-term freshwater objective	PC1-9671	Craig, Jeffery	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipa Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.
Objective 1 – Long-term freshwater objective	PC1-471	Dunlop, Tania	Oppose	<p>PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipa Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.</p> <p>The proposed deletion of the nitrogen reference point from PC1 is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Objective 1 – Long-term freshwater objective	PC1-4449	Eel Enhancement Company Limited	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. The River Iwi are clear in their view that any future allocation system should not be based on a pure grandparented approach.</p>

Table 1

				The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)
Objective 1 – Long-term freshwater objective	PC1-1148	Eight Mile Farm Ltd	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Amendments proposed to delete Objective 1 and/or lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>
Objective 1 – Long-term freshwater objective	PC1-5052	Farm Environment Trust (Waikato)	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis.</p> <p>Joint solutions such as catchment planning, catchment collectives/committees and community action groups that achieve the same or better outcomes as intended by Objective 3 of PC1 are supported by the River Iwi</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Objective 1 – Long-term freshwater objective	PC1-10417	Farmers 4 Positive Change (F4PC)	Oppose	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p>
Objective 1 – Long-term freshwater objective	PC1-9699	Fertiliser Association of New Zealand	Oppose	<p>The River Iwi oppose inclusion of the term “maintenance” and “as relevant” and consider the amendments dilute the intent of Objective 1. The River Iwi contend PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “as relevant”.</p> <p>The River Iwi also believe the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096).</p>

Table 1

Objective 1 – Long-term freshwater objective	PC1-5876	Fletcher Trust	Oppose	<p>The River Iwi the term the proposed amendments as they dilute the intent of Objective 1. PC1 must give effect to Te Ture Whaimana and the NPS-FM 2017. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “protect and where necessary restore”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipā River catchments, not just “where necessary”. The specific targets to achieve the short-term freshwater objectives in 10-years are reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Furthermore, the River Iwi believe the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Objective 1 – Long-term freshwater objective	PC1-10455	Fonterra Co-operative Group Ltd	Oppose	<p>The River Iwi the term the proposed amendments as they dilute the intent of Objective 1. PC1 must give effect to Te Ture Whaimana and the NPS-FM 2017. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “protect and where necessary restore”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipā River catchments, not just “where necessary”. The specific targets to achieve the short-term freshwater objectives in 10-years are reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Furthermore, the River Iwi believe the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Objective 1 – Long-term freshwater objective	PC1-3063	GBC Winstone	Support in Part	<p>The River Iwi consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain or improve”. Furthermore, the River Iwi believe the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Objective 1 – Long-term freshwater objective	PC1-6448	Gleeson, Graeme B	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis.</p>

Table 1

				The River Iwi refer to the relief sought in submission points on Table 3.11-1 in respect of E.coli, Chlorophyll a, nitrate-nitrogen and ammoniacal nitrogen, and Table 3.11-2 in respect of Total Nitrogen, Total Phosphorus. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings
Objective 1 – Long-term freshwater objective	PC1-2846	Greenplan Holdings Limited	Oppose	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096). Amendments proposed to delete Objective 1 and/or lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.
Objective 1 – Long-term freshwater objective	PC1-9853	Hamilton, Malibu	Oppose	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The River Iwi consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain or improve overall water quality”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, as opposed to being flat lined at the “national bottom line” standards set out in the NPS-FM.
Objective 1 – Long-term freshwater objective	PC1-5362	Hancock Forest Management (NZ) Ltd	Oppose	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis. Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi. The River Iwi refer to the relief sought in submission points on Table 3.11-1 in respect of E.coli, Chlorophyll a, nitrate-nitrogen and ammoniacal nitrogen, and Table 3.11-2 in respect of Total Nitrogen, Total Phosphorus. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings.
Objective 1 – Long-term freshwater objective	PC1-7471	Hill Country Farmers Group	Oppose	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The River Iwi consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain or improve overall water quality”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, as opposed to being flat lined at the “national bottom line” standards set out in the NPS-FM.

Table 1

				<p>The River Iwi refer to the relief sought in submission points on Table 3.11-1 in respect of nitrate-nitrogen and ammoniacal nitrogen, and Table 3.11-2 in respect of Total Nitrogen, Total Phosphorus. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings</p> <p>The River Iwi consider the effects of water quality during flood events on downstream receiving water quality should be carefully considered before high river flows are excluded from any freshwater objective(s) or limit(s). This is particularly important in the context of the Waikato River being the longest river system in New Zealand, and functioning, for a significant proportion of its course, as a series of lakes. The hydro lakes and lower river often remain swimmable even when a tributary stream may not be swimmable due to a high flow event. Nutrient, pathogen and sediment loads carried by tributaries during high flow events are, at least in part, retained in the Waikato River lakes and mainstem for sufficiently long periods of time to have effect on ecological and recreational values. The River Iwi do not support the exclusion of high flow events unless the risks to downstream water quality are understood and managed.</p>
Objective 1 – Long-term freshwater objective	PC1-4531	Holmes, Gavin	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis. The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community.</p> <p>The River Iwi consider the effects of water quality during flood events on downstream receiving water quality should be carefully considered before high river flows are excluded from any freshwater objective(s) or limit(s). This is particularly important in the context of the Waikato River being the longest river system in New Zealand, and functioning, for a significant proportion of its course, as a series of lakes. The hydro lakes and lower river often remain swimmable even when a tributary stream may not be swimmable due to a high flow event. Nutrient, pathogen and sediment loads carried by tributaries during high flow events are, at least in part, retained in the Waikato River lakes and mainstem for sufficiently long periods of time to have effect on ecological and recreational values. The River Iwi do not support the exclusion of high flow events unless the risks to downstream water quality are understood and managed.</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>
Objective 1 – Long-term freshwater objective	PC1-9939	Horticulture New Zealand (HortNZ)	Oppose	<p>The River Iwi oppose the insertion of “the adverse effects from” as the purpose of PC1 is to reduce the discharge of those contaminants. The adverse effects that result from the discharge of the contaminants —leading to degraded water quality— are the rationale for why Objective 1 and 3 are required and do not need to be stated. The wording “desired intrinsic” is ambiguous and open to interpretation. The River Iwi prefer the approach of setting “targets” that need to be achieved and are expressed through Table 3.11-1 in 80-years.</p> <p>The River Iwi consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” in Objective 1.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>

Table 1

Objective 1 – Long-term freshwater objective	PC1-6637	Jodean Farms	Oppose	The River Iwi the term the proposed amendments as they dilute the intent of Objective 1. PC1 must give effect to Te Ture Whaimana and the NPS-FM 2017. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintenance”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipā River catchments, not just if necessary. The specific targets to achieve the short-term freshwater objectives in 10-years are reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).
Objective 1 – Long-term freshwater objective	PC1-1751	Kilgour, Gareth	Oppose	The River Iwi oppose the relief sought as Table 3.11-1 is integral to the efficacy of PC1 and must form part of Objective 1. The River Iwi note, however, that amendments —such as set out in the River Iwi submission— are required to improve Table 3.11-1.
Objective 1 – Long-term freshwater objective	PC1-8255	Maraekowhai Ltd	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis. The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community.</p> <p>The River Iwi consider the effects of water quality during flood events on downstream receiving water quality should be carefully considered before high river flows are excluded from any freshwater objective(s) or limit(s). This is particularly important in the context of the Waikato River being the longest river system in New Zealand, and functioning, for a significant proportion of its course, as a series of lakes. The hydro lakes and lower river often remain swimmable even when a tributary stream may not be swimmable due to a high flow event. Nutrient, pathogen and sediment loads carried by tributaries during high flow events are, at least in part, retained in the Waikato River lakes and mainstem for sufficiently long periods of time to have effect on ecological and recreational values. The River Iwi do not support the exclusion of high flow events unless the risks to downstream water quality are understood and managed.</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>
Objective 1 – Long-term freshwater objective	PC1-6978	Matahuru Farms Ltd	Oppose	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. Amendments proposed to delete the objectives of PC1 are opposed by the River Iwi.
Objective 1 – Long-term freshwater objective	PC1-9289	Matira Sub Catchment Group	Oppose	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. Amendments proposed to delete the objectives of PC1 are opposed by the River Iwi.
Objective 1 – Long-term freshwater objective	PC1-8307	McGovern, Annette	Oppose	The River Iwi oppose the relief sought as Table 3.11-1 is integral to the efficacy of PC1 and must form part of Objective 1. The River Iwi note, however, that amendments —such as set out in the River Iwi submission— are required to improve Table 3.11-1.

Table 1

Objective 1 – Long-term freshwater objective	PC1-8767	Miraka Limited	Support in Part	<p>Decreasing the size of existing FMUs and Identifying sub-catchments as FMUs has future appeal. There would be benefits in reducing the scope of the implicit averaging approach adopted by Objective A2 of the NPS-FM by scaling down the size of each FMU, and the quality of information from land use at the sub-catchment scale would be high. At this time, there needs to be a balance in effort between administrative management (ie, the scale of management), what is measured/monitored (as opposed to being modelled) and ensuring mitigation measures are out in place on land to achieve the short-term freshwater objective by 2026.</p> <p>The River iwi note they support sub-catchment planning and the use of catchment collectives —using catchment based planning— as one mechanism to achieve improved water quality outcomes at a greater scale than might be possible using singular farm environment plans. Sub-catchment based planning and catchment collectives need to demonstrate that water quality improvements will occur through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p>
Objective 1 – Long-term freshwater objective	PC1-4266	Moerangi Trust	Support in Part	<p>River Iwi consider Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Objective 1 – Long-term freshwater objective	PC1-6850	Muir, Mark	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis. The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community.</p> <p>The River Iwi consider the effects of water quality during flood events on downstream receiving water quality should be carefully considered before high river flows are excluded from any freshwater objective(s) or limit(s). This is particularly important in the context of the Waikato River being the longest river system in New Zealand, and functioning, for a significant proportion of its course, as a series of lakes. The hydro lakes and lower river often remain swimmable even when a tributary stream may not be swimmable due to a high flow event. Nutrient, pathogen and sediment loads carried by tributaries during high flow events are, at least in part, retained in the Waikato River lakes and mainstem for sufficiently long periods of time to have effect on ecological and recreational values. The River iwi do not support the exclusion of high flow events unless the risks to downstream water quality are understood and managed.</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>
Objective 1 – Long-term freshwater objective	PC1-6322	Oji Fibre Solutions (NZ) Limited	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority</p>

Table 1

				<p>sub-catchment basis. Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p> <p>The River Iwi refer to the relief sought in submission points on Table 3.11-1 in respect of E.coli, Chlorophyll a, nitrate-nitrogen and ammoniacal nitrogen, and Table 3.11-2 in respect of Total Nitrogen, Total Phosphorus. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings.</p>
Objective 1 – Long-term freshwater objective	PC1-6278	Pouakani Trust	Support in Part	<p>Decreasing the size of existing FMUs and Identifying sub-catchments as FMUs has future appeal. There would be benefits in reducing the scope of the implicit averaging approach adopted by Objective A2 of the NPS-FM by scaling down the size of each FMU, and the quality of information from land use at the sub-catchment scale would be high. At this time, there needs to be a balance in effort between administrative management (ie, the scale of management), what is measured/monitored (as opposed to being modelled) and ensuring mitigation measures are out in place on land to achieve the short-term freshwater objective by 2026.</p> <p>The River iwi note they support sub-catchment planning and the use of catchment collectives —using catchment based planning— as one mechanism to achieve improved water quality outcomes at a greater scale than might be possible using singular farm environment plans. Sub-catchment based planning and catchment collectives need to demonstrate that water quality improvements will occur through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p>
Objective 1 – Long-term freshwater objective	PC1-7770	Pukekohe Vegetable Growers Association Inc (PVGA)	Oppose	<p>The River Iwi opposes the relief sought and considers the 10-year water quality targets for each sub-catchment — set out in Table 3.11-2— are required to be met by 2026 in accordance with Objective 3. If the numerical attribute states (targets) are met in a sub-catchment ahead of 2026, then those attribute states become the limit until PC1 is replaced by a new plan change with new targets post 2026 to further increase water quality (staged approach agreed by the CSG).</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Objective 1 – Long-term freshwater objective	PC1-6934	R.P O'Connor and Sons Ltd	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis. The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community.</p> <p>The River Iwi consider the effects of water quality during flood events on downstream receiving water quality should be carefully considered before high river flows are excluded from any freshwater objective(s) or limit(s). This is particularly important in the context of the Waikato River being the longest river system in New Zealand, and functioning, for a significant proportion of its course, as a series of lakes. The hydro lakes and lower river often remain swimmable even when a tributary stream may not be swimmable due to a high flow event. Nutrient, pathogen and sediment loads carried by tributaries during high flow events are, at least in part, retained in the Waikato River lakes and mainstem for sufficiently long periods of time to have effect on ecological and recreational values. The River iwi do not support the exclusion of high flow events unless the risks to downstream water quality are understood and managed.</p>

Table 1

				Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.
Objective 1 – Long-term freshwater objective	PC1-10096	Ravensdown Limited	Oppose	<p>The River Iwi oppose inclusion of the term “maintenance” and “as relevant” and consider the amendments dilute the intent of Objective 1. The River Iwi contend PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “as relevant”.</p> <p>The River Iwi also believe the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096).</p>
Objective 1 – Long-term freshwater objective	PC1-5456	Sieling Farms	Oppose	<p>The River Iwi oppose the relief sought and consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain or improve overall water quality”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, as opposed to being flat lined at the “national bottom line” standards set out in the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Objective 1 – Long-term freshwater objective	PC1-2706	Spectrum Dairies Limited Partnership	Not stated	Refer to responses to “itemised” further submissions on sections of PC1
Objective 1 – Long-term freshwater objective	PC1-5029	Stark, Steven and Theresa	Oppose	<p>The River Iwi oppose the relief sought and consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain or improve overall water quality”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, as opposed to being flat lined at the “national bottom line” standards set out in the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Objective 1 – Long-term freshwater objective	PC1-4048	Stokes Shorthorn Farm Ltd	Support in Part	<p>The River Iwi oppose the relief sought and consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain or improve overall water quality”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, as opposed to being flat lined at the “national bottom line” standards set out in the NPS-FM.</p>

Table 1

				<p>The water quality targets set out in Table 3.11-1 and the 80-year staged approach to achieving Te Ture Whaimana takes into account the balance between the environment and peoples cultural, social and economic wellbeing. The River Iwi agree that everyone needs to contribute to address water quality problems; both urban and rural.</p> <p>Amendments proposed to delete Objective 1 and/or lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>
Objective 1 – Long-term freshwater objective	PC1-6513	Taniwha Estate Ltd	Oppose	<p>The River Iwi the term the proposed amendments as they dilute the intent of Objective 1. PC1 must give effect to Te Ture Whaimana and the NPS-FM 2017. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “protect and where necessary restore”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipā River catchments, not just “where necessary”. The specific targets to achieve the short-term freshwater objectives in 10-years are reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Furthermore, the River Iwi believe the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Objective 1 – Long-term freshwater objective	PC1-6879	Te Miro Farms Partnership	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis. The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community.</p> <p>The River Iwi consider the effects of water quality during flood events on downstream receiving water quality should be carefully considered before high river flows are excluded from any freshwater objective(s) or limit(s). This is particularly important in the context of the Waikato River being the longest river system in New Zealand, and functioning, for a significant proportion of its course, as a series of lakes. The hydro lakes and lower river often remain swimmable even when a tributary stream may not be swimmable due to a high flow event. Nutrient, pathogen and sediment loads carried by tributaries during high flow events are, at least in part, retained in the Waikato River lakes and mainstem for sufficiently long periods of time to have effect on ecological and recreational values. The River Iwi do not support the exclusion of high flow events unless the risks to downstream water quality are understood and managed.</p>
Objective 1 – Long-term freshwater objective	PC1-8218	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Support	<p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096) or sooner where practicable.</p>

Table 1

Objective 1 – Long-term freshwater objective	PC1-5661	The Surveying Company Ltd	Support in Part	<p>The River Iwi oppose the relief sought and consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain or improve overall water quality”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, as opposed to being flat lined at the “national bottom line” standards set out in the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Objective 1 – Long-term freshwater objective	PC1-5073	The Worsp Family Trust	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. Amendments proposed to delete the objectives of PC1 are opposed by the River Iwi.</p>
Objective 1 – Long-term freshwater objective	PC1-3067	Timberlands Limited	Support in part	<p>The River iwi support mechanisms that will achieve the short-term freshwater objectives — to put in place the necessary mitigation measures required to achieve 10% of the journey towards Te Ture Whaimana— that is to be achieved in 10-years (by 2026), and the long-term freshwater objectives to achieve Te Ture Whaimana in 80-years (by 2096).</p> <p>The River Iwi refer to the relief sought in submission points on Table 3.11-1 in respect of nitrate-nitrogen and ammoniacal nitrogen, and Table 3.11-2 in respect of Total Nitrogen, Total Phosphorus. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings</p>
Objective 1 – Long-term freshwater objective	PC1-9752	Trinity Lands Ltd	Support in part	<p>The River iwi support mechanisms that will achieve the short-term freshwater objectives — to put in place the necessary mitigation measures required to achieve 10% of the journey towards Te Ture Whaimana— that is to be achieved in 10-years (by 2026), and the long-term freshwater objectives to achieve Te Ture Whaimana in 80-years (by 2096).</p> <p>The River Iwi refer to the relief sought in submission points on Table 3.11-1 in respect of E.coli, Chlorophyll a, nitrate-nitrogen and ammoniacal nitrogen, and Table 3.11-2 in respect of Total Nitrogen, Total Phosphorus. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings</p>
Objective 1 – Long-term freshwater objective	PC1-1270	Verkerk, Gwyneth	Support in Part	<p>The River Iwi support the inclusion of objectives and policies to provide for the restoration and protection of the Whangamarino Wetland, Lake Waikare (including specific objectives for Lakes FMU) and methods to identify and protect existing wetlands in the Waikato and Waipā River catchments.</p> <p>Amendments to strengthen the intent of PC1 in achieving Te Ture Whaimana in 80-years (by 2096) are supported by River Iwi.</p>
Objective 1 – Long-term freshwater objective	PC1-3780	Verry, Reon and Wendy	Oppose	<p>The River Iwi consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain or improve”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “and/or”. The specific targets to achieve the short-term freshwater objectives in 10-years are reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>

Table 1

Objective 1 – Long-term freshwater objective	PC1-6232	Waikato Environment Centre	Support in Part	<p>The River Iwi support in part the relief sought and consider PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>PC1 provides flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants, including the use of internal offset mitigations, that can be recorded in farm environment plans. The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond] and can only occur when the accounting framework is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to PC1 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p>
Objective 1 – Long-term freshwater objective	PC1-6232	Waikato Regional Council	Support in Part	<p>The River Iwi support the requirement to take into account the impacts of a changing climate. However the relief sought is vague and the River Iwi request to be involved in any further development of PC1 and Table 3.11-1 and 3.11-2 through caucusing ahead of hearings to address this matter.</p>
Objective 1 – Long-term freshwater objective	PC1-4677	Waipapa Farms Ltd and Carlye Holdings Ltd	Oppose	<p>The River Iwi oppose the relief sought as Table 3.11-1 is integral to the efficacy of PC1 and must form part of Objective 1. The River Iwi note, however, that amendments —such as set out in the River Iwi submission— are required to improve Table 3.11-1.</p>
Objective 1 – Long-term freshwater objective	PC1-11261	Wairakei Pastoral Ltd	Oppose	<p>The River Iwi oppose inclusion of the term “maintenance” and “as relevant” and consider the amendments dilute the intent of Objective 1. The River Iwi contend PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “as relevant”.</p> <p>The River Iwi also believe the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096).</p>
Objective 1 – Long-term freshwater objective	PC1-2076	Wairarapa Moana Incorporated	Oppose	<p>Decreasing the size of existing FMUs and Identifying sub-catchments as FMUs has future appeal. There would be benefits in reducing the scope of the implicit averaging approach adopted by Objective A2 of the NPS-FM by scaling down the size of each FMU, and the quality of information from land use at the sub-catchment scale would be high. At this time, there needs to be a balance in effort between administrative management (ie, the scale of management), what is measured/monitored</p>

Table 1

				(as opposed to being modelled) and ensuring mitigation measures are out in place on land to achieve the short-term freshwater objective by 2026.
Objective 1 – Long-term freshwater objective	PC1-4143	Woodacre Partnership	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis. The specific targets to achieve the short-term freshwater objectives in 10-years are reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>The River Iwi consider the effects of water quality during flood events on downstream receiving water quality should be carefully considered before high river flows are excluded from any freshwater objective(s) or limit(s). This is particularly important in the context of the Waikato River being the longest river system in New Zealand, and functioning, for a significant proportion of its course, as a series of lakes. The hydro lakes and lower river often remain swimmable even when a tributary stream may not be swimmable due to a high flow event. Nutrient, pathogen and sediment loads carried by tributaries during high flow events are, at least in part, retained in the Waikato River lakes and mainstem for sufficiently long periods of time to have effect on ecological and recreational values. The River Iwi do not support the exclusion of high flow events unless the risks to downstream water quality are understood and managed.</p> <p>Amendments proposed to delete Objective 1 and/or lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Objective 2: Social, economic and cultural wellbeing is maintained in the long term/Te Whāinga 2: Ka whakaūngia te oranga ā-pāpori, ā-ōhanga, ā-ahurea hoki i ngā tauroa				
Objective 2 – Social, economic and cultural wellbeing	PC1-6998	Ata Rangi 2015 Limited partnership	Oppose	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community WILL also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments. If nothing was done to achieve Te Ture Whaimana, the Waikato and Waipā Rivers would continue to bear the cost of the cumulative effect of unsustainable land use practices across the catchment.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-4786	Bailey, James	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p>

Table 1

				The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.
Objective 2 – Social, economic and cultural wellbeing	PC1-11387	Balle Bros Group	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community WILL also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments. If nothing was done to achieve Te Ture Whaimana, the Waikato and Waipā Rivers would continue to bear the cost of the cumulative effect of unsustainable land use practices across the catchment.</p> <p>The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-11233	Beef + Lamb New Zealand Limited	Oppose	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments. If nothing was done to achieve Te Ture Whaimana, the Waikato and Waipā Rivers would continue to bear the cost of the cumulative effect of unsustainable land use practices across the catchment.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-8012	Black Jack Farms	Oppose	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). The maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>Objective 2 is part of a contextual balance with other objectives, policies and methods in PC1 and does not require amendments as proposed.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-1370	Buckley, Peter Ross	Support in Part	Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.

Table 1

				<p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-6130	Cameron, Bruce	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-7600	Charion Investment Trust	Oppose	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). While the existing use of water provides economic and social benefits to the community, the existing pattern of water use may not always remain constant over time due to the nature of resource consents being time constrained and conditioned, and not akin to property rights.</p>

Table 1

Objective 2 – Social, economic and cultural wellbeing	PC1-7725	Clements, Robyn Ethel	Support in part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The design of PC1 was supported by economic analysis and modelling that is captured in the Section 32 report. The River Iwi is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-9672	Craig, Jeffery	Support in part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of the PC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p> <p>The design of PC1 was supported by economic analysis and modelling that is captured in the Section 32 report. The River Iwi is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-470	Dunlop, Tania	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the</p>

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Objective 2 – Social, economic and cultural wellbeing	PC1-1150	Eight Mile Farm Ltd	Support in Part	The RMA specifies a 10-year planning horizon for regional plans. While a good idea in theory to set an 80-year plan to avoid uncertainty, the contents of such a plan would be deemed ultra vires. Instead it is necessary to signal the long-term (80-year) freshwater objective to achieve Te Ture Whaimana and ensure this remains the ultimate outcome that successive (every 10-year) regional plans strive to achieve.
Objective 2 – Social, economic and cultural wellbeing	PC1-10420	Farmers 4 Positive Change (F4PC)	Support in Part	Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana. The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.
Objective 2 – Social, economic and cultural wellbeing	PC1-9700	Fertiliser Association of New Zealand	Oppose	Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana. The proposed amendments preclude the important fact captured in the Section 32 report that the CSG predicated the design of PC1 on the 80-year timeframe to minimise negative effects on peoples economic, social, spiritual and cultural wellbeing in the long-term. The River Iwi oppose the proposed amendments as they allow for a subsequent relitigation of timeframes and would put at risk achieving Te Ture Whaimana in 80-years (by 2096).
Objective 2 – Social, economic and cultural wellbeing	PC1-5881	Fletcher Trust	Support in Part	Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana. The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.
Objective 2 – Social, economic and cultural wellbeing	PC1-10457	Fonterra Co-Operative Group Ltd	Oppose	Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of

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Objective 2 – Social, economic and cultural wellbeing	PC1-10635	Fonterra Co-Operative Shareholders Council	Oppose	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The proposed amendments preclude the important fact captured in the Section 32 report that the CSG predicated the design of PC1 on the 80-year timeframe to minimise negative effects on peoples economic, social, spiritual and cultural wellbeing in the long-term. The River Iwi oppose the proposed amendments as they allow for a subsequent relitigation of timeframes and would put at risk achieving Te Ture Whaimana in 80-years (by 2096).</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-10740	Fulton Hogan Limited	Oppose	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The proposed amendments preclude the important fact captured in the Section 32 report that the CSG predicated the design of PC1 on the 80-year timeframe to minimise negative effects on peoples economic, social, spiritual and cultural wellbeing in the long-term. The River Iwi oppose the proposed amendments as they allow for a subsequent relitigation of timeframes and would put at risk achieving Te Ture Whaimana in 80-years (by 2096).</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-985	Gaston, Jo and Andrew	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-6449	Gleeson, Graeme	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of</p>

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Objective 2 – Social, economic and cultural wellbeing	PC1-5372	Hancock Forest Management (NZ) Ltd	Oppose	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The complexity of achieving Te Ture Whaimana over an 80-year period, and the resulting change to land use practices that will be required, necessitate PC1 measure the relative performance of economic, social, spiritual and cultural wellbeing in the long-term so that future plan changes can be finely tuned. The relief sought is opposed and Objective 2 needs to be retained and strengthened.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-7486	Hill Country Farmers Group	Oppose	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The proposed amendments preclude the important fact captured in the Section 32 report that the CSG predicated the design of PC1 on the 80-year timeframe to minimise negative effects on peoples economic, social, spiritual and cultural wellbeing in the long-term. The River Iwi oppose the proposed amendments as they allow for a subsequent relitigation of timeframes and would put at risk achieving Te Ture Whaimana in 80-years (by 2096).</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-4534	Holmes, Gavin	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.</p>

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Objective 2 – Social, economic and cultural wellbeing	PC1-9940	Horticulture New Zealand (HortNZ)	Support in Part	Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana. The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.
Objective 2 – Social, economic and cultural wellbeing	PC1-6405	J Swapp Ltd	Support in Part	Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana. The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.
Objective 2 – Social, economic and cultural wellbeing	PC1-1330	Jivan Produce Ltd	Support in Part	Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana. The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments. The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.
Objective 2 – Social, economic and cultural wellbeing	PC1-6947	Jodean Farms	Oppose	Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.

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Objective 2 – Social, economic and cultural wellbeing	PC1-1758	Kilgour, Gareth	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 2 is part of a contextual balance with other objectives and does not require amendments as proposed.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-6813	Jefferies, Daniel	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>

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Objective 2 – Social, economic and cultural wellbeing	PC1-8873	Maraekowhai Ltd	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 2 is part of a contextual balance with other objectives and does not require amendments as proposed.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-6985	Matahuru Farms Ltd	Oppose	<p>PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipa Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-8308	McGovern, Annette	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-9506	Mercury NZ Limited	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of</p>

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Objective 2 – Social, economic and cultural wellbeing	PC1-8906	Miraka Limited	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 2 is part of a contextual balance with other objectives and does not require amendments as proposed.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-6851	Muir, Mark	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the</p>

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Objective 2 – Social, economic and cultural wellbeing	PC1-6366	Oji Fibre Solutions (NZ) Limited	Oppose	<p>PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipa Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.</p> <p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The complexity of achieving Te Ture Whaimana over an 80-year period, and the resulting change to land use practices that will be required, necessitate PC1 measure the relative performance of economic, social, spiritual and cultural wellbeing in the long-term so that future plan changes can be finely tuned. The relief sought is opposed and Objective 2 needs to be retained and strengthened.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-11129	Primary Land Users Group	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-10097	Ravesndown Limited	Oppose	<p>PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipa Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.</p>

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				<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The complexity of achieving Te Ture Whaimana over an 80-year period, and the resulting change to land use practices that will be required, necessitate PC1 measure the relative performance of economic, social, spiritual and cultural wellbeing in the long-term so that future plan changes can be finely tuned. The relief sought is opposed and Objective 2 needs to be retained and strengthened.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-3153	Riverheads Ltd	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 2 is part of a contextual balance with other objectives and does not require amendments as proposed.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-11093	Southern Pastures Limited Partnership	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community WILL benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-2721	Spectrum Dairies Limited Partnership	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of</p>

Table 1

				<p>economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-5033	Stark, Steven and Theresa	Oppose	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The proposed amendments preclude the important fact captured in the Section 32 report that the CSG predicated the design of PC1 on the 80-year timeframe to minimise negative effects on peoples economic, social, spiritual and cultural wellbeing in the long-term. The River Iwi oppose the proposed amendments as they allow for a subsequent relitigation of timeframes and would put at risk achieving Te Ture Whaimana in 80-years (by 2096).</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-5023	Stevenson Resources Limited	Oppose	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The proposed amendments preclude the important fact captured in the Section 32 report that the CSG predicated the design of PC1 on the 80-year timeframe to minimise negative effects on peoples economic, social, spiritual and cultural wellbeing in the long-term. The River Iwi oppose the proposed amendments as they allow for a subsequent relitigation of timeframes and would put at risk achieving Te Ture Whaimana in 80-years (by 2096).</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-6885	Te Miro Farms Partnership	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p>

Table 1

				The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.
Objective 2 – Social, economic and cultural wellbeing	PC1-8220	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-7076	Tirohanga Settlers and Sports Association	Oppose	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The proposed amendments preclude the important fact captured in the Section 32 report that the CSG predicated the design of PC1 on the 80-year timeframe to minimise negative effects on peoples economic, social, spiritual and cultural wellbeing in the long-term. The River Iwi oppose the proposed amendments as they allow for a subsequent relitigation of timeframes and would put at risk achieving Te Ture Whaimana in 80-years (by 2096).</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-9755	Trinity Lands Ltd	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p>

Table 1

Objective 2 – Social, economic and cultural wellbeing	PC1-6233	Waikato Environment Centre	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The use of offsets is likely to be an effective mechanism that may assist with achieving Objective 2 and Objective 3. However, the use of offsets for diffuse discharges of contaminants [if PC1 is amended] must only occur when the accounting framework is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-4680	Waipapa Farms Ltd and Carlyle Holdings Ltd	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>Primary production is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-11262	Wairakei Pastoral Ltd	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-6773	Twining, Murray Ian and Robyn Joy	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of</p>

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				<p>economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1—to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-4168	Woodacre Partnership	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1—to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 2 – Social, economic and cultural wellbeing	PC1-11524	Yule, Don, Lauris and Yvette	Support in Part	<p>Objective 2 is integral to the rationale for adopting an 80-year timeframe to achieve Te Ture Whaimana and is part of a contextual balance with other objectives to achieve short-term freshwater objectives in 10-years (by 2026). PC1 recognises it will take sufficient time to transition away from current practices and (in some cases) land; meaning the maintenance of</p>

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				<p>economic, social, spiritual and cultural wellbeing in the long-term is important and needs to be balanced with the timeframe to achieve Te Ture Whaimana.</p> <p>The River Iwi note the community will also benefit for the restoration and protection of the Waikato and Waipā Rivers and is supportive of improvements to Objective 2 that highlight the benefits accruing to the community from the sustainable use of the Waikato and Waipā River catchments.</p> <p>The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The development of robust indicators to measure economic, social, spiritual and cultural wellbeing is supported and should be woven into reporting on the efficacy of PC1.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of the PC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further 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/Te Whāinga 3: Ngā whakapainga taupoto o te kounga wai i te wāhanga tuatahi o te whakaoranga me te tiakanga o te kounga wai i ia riu kōawāwa me te Wae Whakahaere Wai Māori				
Objective 3 – Short-term improvements in water quality	PC1-4307	A S Wilcox & Sons Ltd	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 already provides for flexibility for land owners to develop Farm Environment Plans to put in place tailored solutions to address critical source areas and to reduce the discharge of the four contaminants from land use.</p> <p>Joint solutions such as catchment collectives/committees and community action groups that achieve the same outcomes as intended by Objective 3 of PC1 are supported by the River Iwi</p>
Objective 3 – Short-term improvements in water quality	PC1-9502	Advisory Committee on Regional Environment (ACRE)	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (by 2096) are opposed by the River Iwi.</p>

Table 1

Objective 3 – Short-term improvements in water quality	PC1-6100	Ata Rangi 2015 Limited Partnership	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (by 2096) are opposed by the River Iwi.</p>
Objective 3 – Short-term improvements in water quality	PC1-10809	Auckland/Waikato Fish and Game	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The River Iwi refer to the relief sought in submission points on Table 3.11-1 in respect of nitrate-nitrogen and ammoniacal nitrogen, and Table 3.11-2 in respect of Total Nitrogen, Total Phosphorus. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings</p> <p>The River Iwi continue to support the definition of objectives in relation to the range of Intrinsic and Use Values identified in PC1 and does not oppose in principle the inclusion of additional attributes, should these improve management of the catchment for the achievement of Te Ture Whaimana. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings.</p> <p>The definition of additional numerical objectives for the attributes suggested in the submission would need to ensure that they are:</p> <ul style="list-style-type: none"> • Within scope of PC1 • Relevant to the waterbody type(s) in each sub-catchment; • At a level that ensures long-term restoration and protection of ecosystem health • Realistic and achievable, having regard to the natural characteristics and current state of each water body <p>The definition and inclusion in PC1 of nitrogen and phosphorus limits expressed as loads may be a useful management but may be best developed as part of the nutrient allocation framework (Policy 7).</p> <p>The River Iwi support in principle the identification of appropriate sites for sub-catchment monitoring (where these sites do not currently exist or where existing sites would benefit from re-location).</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p>
Objective 3 – Short-term improvements in water quality	PC1-4796	Bailey, James	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. This process would include whether resource rentals are appropriate as an alternative.</p>

Table 1

Objective 3 – Short-term improvements in water quality	PC1-11329	Balle Bros Group	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Amendments proposed dilute the intent of achieve Objective 3 are opposed by the River Iwi.</p>
Objective 3 – Short-term improvements in water quality	PC1-11428	Beef + Lamb New Zealand Limited	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Amendments proposed lengthen the timeframe to achieve Objective 3 (by 2026) and to dilute the intent of achieve Objective 3 are opposed by the River Iwi.</p>
Objective 3 – Short-term improvements in water quality	PC1-5512	Chhagn Bros Co Ltd	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 already provides for flexibility for land owners to develop Farm Environment Plans to put in place tailored solutions to address critical source areas and to reduce the discharge of the four contaminants from land use.</p> <p>Joint solutions such as catchment collectives/committees and community action groups that achieve the same outcomes as intended by Objective 3 of PC1 are supported by the River Iwi</p>
Objective 3 – Short-term improvements in water quality	PC1-7895	Clements, Robyn Ethel	Oppose	<p>PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipa Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.</p> <p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana</p>
Objective 3 – Short-term improvements in water quality	PC1-9673	Craig, Jeffery	Oppose	<p>PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipa Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.</p> <p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana</p>
Objective 3 – Short-term improvements in water quality	PC1-10168	DairyNZ	Oppose	<p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported.</p>

Table 1

				<p>However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits.</p>
Objective 3 – Short-term improvements in water quality	PC1-10540	Department of Conservation	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>If the short-term freshwater objectives are achieved ahead of 2026, the River Iwi suggest signals in PC1 —that further plan changes are required to achieve Te Ture Whaimana by 2096—, may result in further progress being made to reduce the discharge of the four contaminants.</p> <p>The River Iwi are also cognisant that Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing and Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, the setting for the short-term freshwater objective is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 3 – Short-term improvements in water quality	PC1-1149	Eight Mile Farms Ltd	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>If the short-term freshwater objectives are achieved ahead of 2026, the River Iwi suggest signals in PC1 —that further plan changes are required to achieve Te Ture Whaimana by 2096—, may result in further progress being made to reduce the discharge of the four contaminants.</p> <p>The River Iwi are also cognisant that Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing and Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, the setting for the short-term freshwater objective is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 3 – Short-term improvements in water quality	PC1-10459	Fonterra Co-operative Group Ltd	Support in Part	<p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported.</p>

Table 1

				<p>However, the 'short-term' language used in the NPS-FM should not preclude (or encumber) the use of the terms such as "long term freshwater objectives", particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term 'targets' to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits.</p>
Objective 3 – Short-term improvements in water quality	PC1-10741	Fulton Hogan Limited	Support in Part	<p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. Changes to "short term <u>freshwater</u> objectives" to be consistent with the language of the NPS-FM are supported.</p> <p>However, the 'short-term' language used in the NPS-FM should not preclude (or encumber) the use of the terms such as "long term freshwater objectives", particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term 'targets' to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits.</p>
Objective 3 – Short-term improvements in water quality	PC1-2866	GBC Winstone	Support in Part	<p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. Changes to "short term <u>freshwater</u> objectives" to be consistent with the language of the NPS-FM are supported.</p> <p>However, the 'short-term' language used in the NPS-FM should not preclude (or encumber) the use of the terms such as "long term freshwater objectives", particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term 'targets' to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits.</p>
Objective 3 – Short-term improvements in water quality	PC1-10211	Hamilton City Council	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. Proposed amendments to dilute Objective 3 through wording such as 'eventually', are opposed by River Iwi.</p>
Objective 3 – Short-term improvements in water quality	PC1-5374	Hancock Forest Management (NZ) Ltd	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 needs a robust monitoring framework to ensure that mitigation measures (designed through FEP) are put in place and implemented.</p> <p>Amendments to strengthen Objective 3 are supported by the River Iwi.</p>
Objective 3 – Short-term improvements in water quality	PC1-7496	Hill Country Farmers Group	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 already provides for flexibility for land owners to develop Farm Environment Plans to put in place tailored solutions to address critical source areas and to reduce the discharge of the four contaminants from land use.</p> <p>Amendments to strengthen Objective 3 are supported by the River Iwi.</p>

Table 1

Objective 3 – Short-term improvements in water quality	PC1-4015	Hira Bhana and Co Ltd	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 already provides for flexibility for land owners to develop Farm Environment Plans to put in place tailored solutions to address critical source areas and to reduce the discharge of the four contaminants from land use. Amendments to strengthen Objective 3 are supported by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-640	J Swap Ltd	Support in Part	The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM. The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits.
Objective 3 – Short-term improvements in water quality	PC1-1331	Jivan Produce Ltd	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 already provides for flexibility for land owners to develop Farm Environment Plans to put in place tailored solutions to address critical source areas and to reduce the discharge of the four contaminants from land use. Joint solutions such as catchment collectives/committees and community action groups that achieve the same outcomes as intended by Objective 3 of PC1 are supported by the River Iwi
Objective 3 – Short-term improvements in water quality	PC1-6950	Jodean Farms	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipa Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-5273	Living Foods Ltd	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information which included prioritisation of sub-catchments and the flexibility to provide for catchment management planning. Amendments to strengthen Objective 3 are supported by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-4991	Makan Daya & Co Ltd	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information which included prioritisation of sub-catchments and the flexibility to provide for catchment management planning. Amendments to strengthen Objective 3 are supported by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-3464	Matamata-Piako District Council	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years took into account the “load to come” from legacy land uses and are considered appropriate and reasonably necessary to enable monitoring of plan

Table 1

				effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096). Amendments proposed to dilute the intent of Objective 3 are opposed by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-9291	Matira Sub Catchment Group	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipa Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-8775	Miraka Limited	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. The River Iwi agree that measurement and monitoring of progress towards achieving Objective 1 and 3 in PC1 are pivotal. Amendments to strengthen existing methods for monitoring PC1 (including plan effectiveness monitoring and the design and commissioning of the accounting framework) are support by River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-6370	Oji Fibre Solutions (NZ) Limited	Support in Part	The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM. The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits.
Objective 3 – Short-term improvements in water quality	PC1-6280	Pouakani Trust	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. The River Iwi agree that measurement and monitoring of progress towards achieving Objective 1 and 3 in PC1 are pivotal. Amendments to strengthen existing methods for monitoring PC1 (including plan effectiveness monitoring and the design and commissioning of the accounting framework) are support by River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-11132	Primary Land Users Group	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. This process would include whether resource rentals are appropriate as an alternative.
Objective 3 – Short-term improvements in water quality	PC1-6936	R.P. O’Connor and Sons Ltd	Support in Part	The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis. The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community.

Table 1

				<p>The effects of water quality during flood events on downstream receiving water quality should be carefully considered before high river flows are excluded from any freshwater objective(s) or limit(s). This is particularly important in the context of the Waikato River being the longest river system in New Zealand, and functioning, for a significant proportion of its course, as a series of lakes. The hydro lakes and lower river often remain swimmable even when a tributary stream may not be swimmable due to a high flow event. Nutrient, pathogen and sediment loads carried by tributaries during high flow events are, at least in part, retained in the Waikato River lakes and mainstem for sufficiently long periods of time to have effect on ecological and recreational values. The River iwi do not support the exclusion of high flow events unless the risks to downstream water quality are understood and managed.</p> <p>PC1 contains methods to continue existing, and put in place new, monitoring stations to monitor water quality improvements in the Waikato and Waipā River catchments. This would include point source discharges (which also have their own more stringent water quality monitoring requirements).</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>
Objective 3 – Short-term improvements in water quality	PC1-10099	Ravensdown Limited	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants.</p> <p>The River Iwi consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain or improve overall water quality”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipā River catchments, as opposed to being flat lined at the “national bottom line” standards set out in the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 and this could include further refinement of reasons for Objective 3, however the reference to the NPS-FM wording ‘overall’ is not supported.</p>
Objective 3 – Short-term improvements in water quality	PC1-5634	Save Lake Karapiro Inc	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096).</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (by 2096) are opposed by the River Iwi.</p>
Objective 3 – Short-term improvements in water quality	PC1-4032	South Waikato District Council	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered</p>

Table 1

				appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096). Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (by 2096) are opposed by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-11095	Southern Pastures Limited Partnership	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. Amendments to strengthen Objective 3 are supported by the River Iwi, particularly the removal of the word “eventually”.
Objective 3 – Short-term improvements in water quality	PC1-5048	Stark, Steven and Theresa	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years took into account the “load to come” from legacy land uses and are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096). Amendments proposed to dilute the intent of Objective 3 are opposed by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-5024	Stevenson Resources Limited	Support in Part	The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.
Objective 3 – Short-term improvements in water quality	PC1-4049	Stokes Shorthorn Farm Ltd	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The specific targets to achieve the short-term freshwater objectives in 10-years are considered appropriate and reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096). Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (by 2096) are opposed by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-7037	Sutherland Produce Ltd	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 already provides for flexibility for land owners to develop Farm Environment Plans to put in place tailored solutions to address critical source areas and to reduce the discharge of the four contaminants from land use. Joint solutions such as catchment collectives/committees and community action groups that achieve the same outcomes as intended by Objective 3 of PC1 are supported by the River Iwi

Table 1

Objective 3 – Short-term improvements in water quality	PC1-8221	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. It is unlikely that mitigation measures put in place in 2016 would have immediately effect. The 2026 date needs to be retained in Objective 3 to ensure plan users and the community have certainty and the effectiveness of the plan can be monitored.
Objective 3 – Short-term improvements in water quality	PC1-5074	The Worsp Family Trust	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. Amendments proposed to lengthen the timeframe to achieve Te Ture Whaimana are opposed by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-7083	Tirohanga Settlers and Sports Association	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. The River Iwi note the community will benefit for the restoration and protection of the Waikato and Waipā Rivers and agree that ALL land uses (including rural or urban) need to contribute to achieving Te Ture Whaimana in 80-years (by 2096).
Objective 3 – Short-term improvements in water quality	PC1-5761	Treweek, Glen	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and amendments to lengthen the timeframe to achieve Te Ture Whaimana are opposed by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-3885	Trustees of Highfield Deer Park	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and amendments to lengthen the timeframe to achieve Te Ture Whaimana are opposed by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-2233	Wai Shing Ltd	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information which included prioritisation of sub-catchments and the flexibility to provide for catchment management planning. Amendments to strengthen Objective 3 are supported by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-3159	Waipa District Council	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. Amendments to strengthen Objective 3 are supported by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-4686	Waipapa Farms Ltd and Carlyle Holdings Ltd	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and amendments to lengthen the timeframe to achieve Te Ture Whaimana are opposed by the River Iwi.

Table 1

Objective 3 – Short-term improvements in water quality	PC1-11265	Wairakei Pastoral Ltd	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information and amendments to dilute the intent of Objective 3 by adding the word <u>overall</u> is opposed by River Iwi.
Objective 3 – Short-term improvements in water quality	PC-12079	Wairarapa Moana	Support in Part	Decreasing the size of existing FMUs and/or identifying individual sub-catchments as FMUs has future appeal. There would be benefits in reducing the scope of the implicit averaging approach adopted by Objective A2 of the NPS-FM by scaling down the size of each FMU and the quality of information from land use at the sub-catchment scale would be high. At this time, there needs to be a balance between what WRC —as administrators of the plan change— can realistically achieve and what is being measured/monitored (as opposed to being modelled). Ultimately, the first stage to achieving Te Ture Whaimana should be gathering robust information and ensuring mitigation measures are out in place on land to achieve the short-term freshwater objective by 2026. Amendments to strengthen Objective 3 are supported by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-7952	Waitomo Catchment Trust Board	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 addresses both point source and diffuse source discharges of the four contaminants from the Waikato and Waipā River catchments. It would be impossible to treat the discharge of sediment and pathogens as point source discharges from rural land use and this amendment is opposed by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-10315	Waitomo District Council	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. Amendments to strengthen Objective 3 are supported by the River Iwi.
Objective 3 – Short-term improvements in water quality	PC1-11525	Yule, Don, Lauris and Yvette	Support in Part	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 was developed using the best available scientific information which included prioritisation of sub-catchments and the flexibility to provide for catchment management planning. Amendments to strengthen Objective 3 are supported by the River Iwi.

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Objective 4: People and community resilience/Te Whāinga 4: Te manawa piharau o te tangata me te hapori				
Objective 4 – People and community resilience	PC1-4308	AS Wilcox & Sons Ltd	Support in Part	River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. An important component of the PC1 architecture is the staged approach which signals PC1 is the first of many stages (plan changes) that will be required to progressively achieve Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.

Table 1

Objective 4 – People and community resilience	PC1-6113	Ata Rangi 2015 Limited Partnership	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-9018	Bailey, James	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p>
Objective 4 – People and community resilience	PC1-6574	Ballance Agri-Nutrients Limited	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The River Iwi support appropriate changes to strengthen the PC1 framework to ensure that short-term freshwater objectives are achieved in 10-years (by 2026).</p>
Objective 4 – People and community resilience	PC1-11393	Balle Bros Group	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana.</p> <p>The River Iwi support appropriate changes to strengthen the PC1 regulatory framework to ensure that short-term freshwater objectives are achieved in 10-years (by 2026).</p>
Objective 4 – People and community resilience	PC1-11483	Beef + Lamb New Zealand Limited	Oppose	<p>The River Iwi consider the proposed amendments to Objective 4 are not required. Objective 2 already provides for the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p> <p>The River Iwi support appropriate changes to strengthen the PC1 regulatory framework to ensure that short-term freshwater objectives are achieved in 10-years (by 2026).</p>

Table 1

Objective 4 – People and community resilience	PC1-8015	Black Jack Farms	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-2539	Buckley, Peter Ross	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-6220	Cameron, Bruce	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-7670	Charion Investments	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>

Table 1

Objective 4 – People and community resilience	PC1-7727	Clements, Robyn Ethel	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-10193	DairyNZ	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana.</p> <p>The River Iwi support appropriate changes to strengthen the PC1 regulatory framework to ensure that short-term freshwater objectives are achieved in 10-years (by 2026). The River Iwi agree that everyone residing in the catchment must do their part to address the water quality problems which in turn will assist to build community resilience.</p>
Objective 4 – People and community resilience	PC1-10542	Department of Conservation	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p>
Objective 4 – People and community resilience	PC1-1151	Eight Mile Farm Ltd	Support in Part	<p>The RMA specifies a 10-year planning horizon for regional plans. While a good idea in theory to set an 80-year plan to avoid uncertainty, the contents of such a plan would be deemed ultra vires. Instead it is necessary to signal the long-term (80-year) freshwater objective to achieve Te Ture Whaimana and ensure this remains the ultimate outcome that successive (every 10-year) regional plans strive to achieve.</p>
Objective 4 – People and community resilience	PC1-10421	Farmers 4 Positive Change (F4PC)	Oppose	<p>The River Iwi considers the staged and sequenced approach will provide for people and communities to adapt to the necessary changes in the management of land use within the Waikato and Waipā River catchment that are required to meet the short-term (and ultimately long-term) freshwater objectives. Signalling to the community that future plan changes will be required to achieve Te Ture Whaimana in 80-years (by 2096) is also important and must be retained.</p>
Objective 4 – People and community resilience	PC1-9703	Fertiliser Association of New Zealand	Support in Part	<p>Signalling to the community that future plan changes are required to achieve Te Ture Whaimana in 80-years (by 2096) is important and must be retained. It is highly unlikely that Te Ture Whaimana will be achieved in 10-years and therefore the need for future plan changes is almost certain.</p>

Table 1

Objective 4 – People and community resilience	PC1-5883	Fletcher Trust	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes WILL BE required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-10468	Fonterra Co-operative Group Ltd	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana.</p> <p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. The proposed reference to achieving Objective 1 and Objective 3 —that explicitly reference the freshwater attribute states contained in Table 3.11-1— could be a workable amendment provided the intent of PC1 to achieve the short-term (and ultimately long-term) freshwater objectives are not diluted.</p>
Objective 4 – People and community resilience	PC1-10743	Fulton Hogan Limited	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana.</p> <p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. The proposed reference to achieving Objective 1 and Objective 3 —that explicitly reference the freshwater attribute states contained in Table 3.11-1— could be a workable amendment provided the intent of PC1 to achieve the short-term (and ultimately long-term) freshwater objectives are not diluted.</p>
Objective 4 – People and community resilience	PC1-972	Gaston, Jo and Andrew	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana.</p> <p>The River Iwi support appropriate changes to strengthen the PC1 regulatory framework to ensure that short-term freshwater objectives are achieved in 10-years (by 2026).</p>
Objective 4 – People and community resilience	PC1-2897	GBC Winstone	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana.</p> <p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. The proposed reference to achieving Objective 1 and Objective 3 —that explicitly reference the freshwater attribute states contained in</p>

Table 1

				Table 3.11-1— could be a workable amendment provided the intent of PC1 to achieve the short-term (and ultimately long-term) freshwater objectives are not diluted.
Objective 4 – People and community resilience	PC1-6450	Gleeson, Graeme B	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-10226	Hamilton City Council	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-5377	Hancock Forest Management (NZ) Ltd	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-7498	Hill Country Farmers Group	Oppose	<p>PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipa Rivers) and the National Policy Statement for Freshwater Management 2017. The withdrawal of PC1 is fundamentally opposed by the River Iwi.</p> <p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p>
Objective 4 – People and community resilience	PC1-4016	Hira, Bhana and Co Ltd	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p>

Table 1

				Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.
Objective 4 – People and community resilience	PC1-4552	Homes, Gavin	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-10005	Horticulture New Zealand (HortNZ)	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change).</p> <p>The WRC need to develop a robust accounting framework to account for the discharge of contaminants for the use of land. The framework must be able to account for the reductions in contaminants discharged that result from successful implementation of mitigation measures, land use practice changes and land use change.</p>
Objective 4 – People and community resilience	PC1-8433	Huirimu Farms Ltd	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p>
Objective 4 – People and community resilience	PC1-6408	J Swapp Ltd	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana.</p> <p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. The proposed reference to achieving Objective 1 and Objective 3 —that explicitly reference the freshwater attribute states contained in Table 3.11-1— could be a workable amendment provided the intent of PC1 to achieve the short-term (and ultimately long-term) freshwater objectives are not diluted.</p>

Table 1

Objective 4 – People and community resilience	PC1-6815	Jefferis, Daniel	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-1332	Jivan Produce	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-6951	Jodean Farms	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. Signalling to the community that future plan changes are required to achieve Te Ture Whaimana in 80-years (by 2096) is important and must be retained. It is highly unlikely that Te Ture Whaimana will be achieved in 10-years and therefore the need for future plan changes is almost certain.</p>
Objective 4 – People and community resilience	PC1-1762	Kilgour, Gareth	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-8964	Lacewood Holdings Ltd	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to</p>

Table 1

				the effective operation of the PC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.
Objective 4 – People and community resilience	PC1-5274	Living Foods Ltd	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p>
Objective 4 – People and community resilience	PC1-4992	Makan, Daya & Co Ltd	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p>
Objective 4 – People and community resilience	PC1-8875	Maraekowhai Ltd	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of the PC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-3468	Matamata Piako District Council	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>

Table 1

Objective 4 – People and community resilience	PC1-9293	Matira Sub Catchment Group	Oppose	The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.
Objective 4 – People and community resilience	PC1-6853	Muir, Mark	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-8727	Nelson Farms Partnerships	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-6389	Oji Fibre Solutions (NZ) Limited	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana.</p> <p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. The proposed reference to achieving Objective 1 and Objective 3 —that explicitly reference the freshwater attribute states contained in Table 3.11-1— could be a workable amendment provided the intent of PC1 to achieve the short-term (and ultimately long-term) freshwater objectives are not diluted.</p>
Objective 4 – People and community resilience	PC1-4183	Perfect Produce Co Ltd	Support in Part	The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.
Objective 4 – People and community resilience	PC1-11135	Primary Land Users Group	Support in Part	The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-

Table 1

				<p>years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The River Iwi support appropriate changes to strengthen the PC1 regulatory framework to ensure that short-term freshwater objectives are achieved in 10-years (by 2026). The River Iwi agree that everyone residing in the catchment must do their part to address the water quality problems and assist to achieve Te Ture Whaimana.</p>
Objective 4 – People and community resilience	PC1-7774	Pukekohe Vegetable Growers Association Inc (PVGA)	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The River Iwi support appropriate changes to strengthen the PC1 regulatory framework to ensure that short-term freshwater objectives are achieved in 10-years (by 2026). The River Iwi agree that everyone residing in the catchment must do their part to address the water quality problems and assist to achieve Te Ture Whaimana.</p>
Objective 4 – People and community resilience	PC1-6942	R.P O'Connor and Sons Ltd	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of the PC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-71223	Ravenscroft, Michael and Clare	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-2468	Rotorua District Council	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 1 already sets out the long-term freshwater objective (to be achieved in 80-years by 2096) and references the numerical water quality attribute states in Table 3.11-1. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>

Table 1

Objective 4 – People and community resilience	PC1-2244	Ryan Farms	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-4034	South Waikato District Council	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-5025	Stevenson Resources Limited	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana.</p> <p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. The proposed reference to achieving Objective 1 and Objective 3 —that explicitly reference the freshwater attribute states contained in Table 3.11-1— could be a workable amendment provided the intent of PC1 to achieve the short-term (and ultimately long-term) freshwater objectives are not diluted.</p>
Objective 4 – People and community resilience	PC1-4057	Stokes Shorthorn Farm Ltd	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>

Table 1

Objective 4 – People and community resilience	PC1-7038	Southerland Produce Limited	Support in Part	<p>The River Iwi considers the staged and sequenced approach will provide for people and communities to adapt to the necessary changes in the management of land use within the Waikato and Waipā River catchment that are required to meet the short-term (and ultimately long-term) freshwater objectives.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of the PC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-9350	Taupo Lake Care Incorporated	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of the PC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-6891	Te Miro Farms Partnership	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-8224	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Oppose	<p>The River Iwi considers the staged and sequenced approach will provide for people and communities to adapt to the necessary changes in the management of land use within the Waikato and Waipā River catchment that are required to meet the short-term (and ultimately long-term) freshwater objectives.</p> <p>Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-5076	The Worsp Family	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p>

Table 1

Objective 4 – People and community resilience	PC1-9758	Trinity Lands Ltd	Oppose	The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.
Objective 4 – People and community resilience	PC1-3886	Trustees of Highfield Deer Park	Oppose	The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.
Objective 4 – People and community resilience	PC1-6775	Twining, Murray Ian and Robyn Joy	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-3785	Verry, Reon and Wendy	Oppose	The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.
Objective 4 – People and community resilience	PC1-2253	Wai Sheng	Support in Part	The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.
Objective 4 – People and community resilience	PC1-6234	Waikato Environment Centre	Support in Part	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p> <p>The use of offsets is likely to be an effective mechanism that may assist with achieving Objective 4. However, the use of offsets can only occur when the accounting framework is operational and capable of tracking and attributing the reduction</p>

Table 1

				in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment.
Objective 4 – People and community resilience	PC1-11266	Wairakei Pastoral Ltd	Oppose	<p>The River Iwi considers the staged and sequenced approach will provide for people and communities to adapt to the necessary changes in the management of land use within the Waikato and Waipā River catchment that are required to meet the short-term (and ultimately long-term) freshwater objectives.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Objective 4 – People and community resilience	PC1-4173	Woodacre Partnership	Support in Part	<p>The River Iwi considers the staged and sequenced approach will provide for people and communities to adapt to the necessary changes in the management of land use within the Waikato and Waipā River catchment that are required to meet the short-term (and ultimately long-term) freshwater objectives.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-925	Worsp, Simon Wynn & Rosemary Elizabeth	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>
Objective 4 – People and community resilience	PC1-11526	Yule, Don, Lauris and Yvette	Support in Part	<p>The River Iwi considers the staged and sequenced approach will provide for people and communities to adapt to the necessary changes in the management of land use within the Waikato and Waipā River catchment that are required to meet the short-term (and ultimately long-term) freshwater objectives.</p> <p>The mechanisms and tools (including the agreed use/application of those mechanisms and tools) set out in PC1 —to gather data and information from the use of land and the corresponding discharge of the four contaminants— is fundamental to the effective operation of thePC1 and will ultimately inform future management decisions (including monitoring/measuring change). PC1 must make use of the best available mechanisms (eg, nitrogen reference points, farm environment plans etc) and tools (eg, overseer etc) to gather data and information.</p>

Table 1

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Objective 5: Mana Tangata – protecting and restoring tangata whenua values/Te Whāinga 5: Te Mana Tangata – te tiaki me te whakaora i ngā uara o te tangata whenua				
Objective 5 – restore and protect values of Tangata whenua	PC1-1378	Buckley, Peter Ross	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Primary production is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.
Objective 5 – restore and protect values of Tangata whenua	PC1-6224	Bruce, Cameron	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Primary production is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.
Objective 5 – restore and protect values of Tangata whenua	PC1-9748	Craig, Jeffery	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. It is appropriate that further restrictions that prevent Treaty Settlement land and Maori freehold land from being developed should be minimised.
Objective 5 – restore and protect values of Tangata whenua	PC1-10545	Department of Conservation	Support in Part	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. It is appropriate that further restrictions that prevent Treaty Settlement land and Maori freehold land from being developed should be minimised. Intrinsic values of land would be duly considered as part of any resource consent (should any Treaty Settlement land and Maori freehold land be proposed for development).
Objective 5 – restore and protect values of Tangata whenua	PC1-480	Dunlop, Tania	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. It is appropriate that further restrictions that prevent Treaty Settlement land and Maori freehold land from being developed should be minimised.
Objective 5 – restore and protect values of Tangata whenua	PC1-10814	Federated Farmers of New Zealand	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. It is appropriate that further restrictions that prevent Treaty Settlement land and Maori freehold land from being developed should be minimised.
Objective 5 – restore and protect values of Tangata whenua	PC1-4553	Holmes, Gavin	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Primary production is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.

Table 1

Objective 5 – restore and protect values of Tangata whenua	PC1-5863	Huirimu Farms Ltd	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. In this respect, the wording of Objective 5 is integral to PC1 and sets out that Tāngata whenua values must be integrated into the long-term management of the Waikato and Waipā River catchments in achieving Te Ture Whaimana.
Objective 5 – restore and protect values of Tangata whenua	PC1-6818	Jefferis, Daniel	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Primary production is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.
Objective 5 – restore and protect values of Tangata whenua	PC1-6954	Jodean Farms	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. In this respect, the wording of Objective 5 is integral to PC1 and sets out that Tāngata whenua values must be integrated into the long-term management of the Waikato and Waipā River catchments in achieving Te Ture Whaimana.
Objective 5 – restore and protect values of Tangata whenua	PC1-1769	Kilgour, Gareth	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Of particular importance to the Waikato and Waipā River Iwi is: (i) exercising mana whakahaere over lands and resources; (ii) sustaining the relationship between ancestral lands and the Waikato and Waipā Rivers (including their tributaries); (iii) retaining an appropriate level of flexibility to utilise land returned through Treaty of Waitangi settlements and Maori freehold land; and (iv) more generally, improving water quality of the awa. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. It is appropriate that further restrictions that prevent Treaty Settlement land and Maori freehold land from being developed should be minimised.
Objective 5 – restore and protect values of Tangata whenua	PC1-8310	McGovern, Annette	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Of particular importance to the Waikato and Waipā River Iwi is: (i) exercising mana whakahaere over lands and resources; (ii) sustaining the relationship between ancestral lands and the Waikato and Waipā Rivers (including their tributaries); (iii) retaining an appropriate level of flexibility to utilise land returned through Treaty of Waitangi settlements and Maori freehold land; and (iv) more generally, improving water quality of the awa. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. It is appropriate that further restrictions that prevent Treaty Settlement land and Maori freehold land from being developed should be minimised.
Objective 5 – restore and protect values of Tangata whenua	PC1-8809	Miraka Limited	Support in Part	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. It is appropriate that further restrictions that prevent Treaty Settlement land and Maori freehold land (eg, restrictions put in place through PC1) from being developed should be minimised.
Objective 5 – restore and protect values of Tangata whenua	PC1-6854	Muir, Mark	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. In this respect, the wording of Objective 5 is integral to PC1 and sets out that Tāngata whenua values must be integrated into the long-term management of the Waikato and Waipā River catchments in achieving Te Ture Whaimana. Primary production is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.

Table 1

Objective 5 – restore and protect values of Tangata whenua	PC1-2347	North Waikato Federated Farmers	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. In this respect, the wording of Objective 5 is integral to PC1 and sets out that Tāngata whenua values must be integrated into the long-term management of the Waikato and Waipā River catchments in achieving Te Ture Whaimana.
Objective 5 – restore and protect values of Tangata whenua	PC1-6391	Oji Fibre Solutions (NZ) Limited	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. In this respect, the wording of Objective 5 is integral to PC1 and sets out that Tāngata whenua values must be integrated into the long-term management of the Waikato and Waipā River catchments in achieving Te Ture Whaimana.
Objective 5 – restore and protect values of Tangata whenua	PC1-5075	Stark, Steven and Theresa	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. In this respect, the wording of Objective 5 is integral to PC1 and sets out that Tāngata whenua values must be integrated into the long-term management of the Waikato and Waipā River catchments in achieving Te Ture Whaimana.
Objective 5 – restore and protect values of Tangata whenua	PC1-8226	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. The ancestral connection and special relationship between iwi and the whenua must not be conditioned. This is entirely contrary to the Treaty of Waitangi and run against the matters set out in the Waikato and Waipā River settlement legislation. Of particular importance to the Waikato and Waipā River Iwi is: (i) exercising mana whakahaere over lands and resources; (ii) sustaining the relationship between ancestral lands and the Waikato and Waipā Rivers (including their tributaries); (iii) retaining an appropriate level of flexibility to utilise land returned through Treaty of Waitangi settlements and Maori freehold land; and (iv) more generally, improving water quality of the awa.
Objective 5 – restore and protect values of Tangata whenua	PC1-7078	Tirohanga Settlers and Sports Association	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. It is appropriate that further restrictions that prevent Treaty Settlement land and Maori freehold land from being developed should be minimised.
Objective 5 – restore and protect values of Tangata whenua	PC1-6371	Tuaropaki Trust	Support in Part	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. If the appropriate regulatory method to provide the ‘right’ balance between developing Treaty Settlement processes and Maori freehold land and meeting the short-term freshwater objectives by 2026 —and ultimately achieving Te Ture Whaimana by 2096— is deemed to be a controlled activity then the River Iwi would support this.
Objective 5 – restore and protect values of Tangata whenua	PC1-6777	Twining, Murray Ian and Robyn Joy	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Primary production is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.
Objective 5 – restore and protect values of Tangata whenua	PC1-3787	Verry, Reon and Wendy	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana.

Table 1

				Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. It is appropriate that further restrictions that prevent Treaty Settlement land and Maori freehold land from being developed should be minimised.
Objective 5 – restore and protect values of Tangata whenua	PC1-4687	Waipapa Farms Ltd and Carlyle Holdings Ltd	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Of particular importance to the Waikato and Waipā River Iwi is: (i) exercising mana whakahaere over lands and resources; (ii) sustaining the relationship between ancestral lands and the Waikato and Waipā Rivers (including their tributaries); (iii) retaining an appropriate level of flexibility to utilise land returned through Treaty of Waitangi settlements and Maori freehold land; and (iv) more generally, improving water quality of the awa. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. It is appropriate that further restrictions that prevent Treaty Settlement land and Maori freehold land from being developed should be minimised.
Objective 5 – restore and protect values of Tangata whenua	PC1-11527	Yule, Don, Lauris and Yvette	Oppose	The Waikato and Waipā River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Primary production is already explicitly provided for through existing values, objectives, policies and regulatory methods in PC1.

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Principal Reasons for Adopting Objectives 1-6/Ngā Take Matua me Whai ngā Whāinga 1 ki te 6				
PRFA – Objectives 1	PC1-6392	Oji Fibre Solutions (NZ) Limited	Neither support or Oppose	The River Iwi have no preference to the relief sought. However if relief is granted and Objectives require consequential amendment, River Iwi request they be involved in any caucusing.

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Reasons for adopting Objective 1				
PRFA – Objective 1	PC1-10622	Fonterra Co-operative Group Ltd	Support in Part	The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported. However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM. The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.

Table 1

PRFA – Objective 1	PC1-10863	Fulton Hogan Limited	Support in Part	<p>The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported.</p> <p>However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.</p>
PRFA – Objective 1	PC1-3604	GBC Winstone	Support in Part	<p>The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported.</p> <p>However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.</p>
PRFA – Objective 1	PC1-10012	Horticulture New Zealand (HortNZ)	Support in Part	<p>River Iwi do not support nor oppose the split of Table 3-11-1 to separate out freshwater “objectives” (chlorophyll a, clarity and E.coli) from limits and targets (total nitrogen, total phosphorus, nitrate and ammonia). Whilst this change might improve consistency with the wording of the NPSFM, it is unclear how this change benefits effective catchment management.</p> <p>River Iwi /support a clear identification of which sub-catchments and FMU currently meet the short and long-term water quality attribute “targets” for total nitrogen, total phosphorus, nitrate and ammonia (these “numbers” should be “limits”), and those that don’t (these “numbers” should be “targets”). A table summarising the current state of water quality at each sub-catchment/FMU monitoring site may also assist the reader.</p> <p>The River Iwi continue to support the definition of objectives in relation to the range of Intrinsic and Use Values identified in PC1 and does not oppose in principle the inclusion of additional attributes, should these improve management of the catchment for the achievement of Te Ture Whaimana. The River Iwi request to be involved in any further development of Table 3.11-1 and 3.11-2 through caucusing ahead of hearings.</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Reasons for adopting Objective 2				
PRFA – Objective 2	PC1-10623	Fonterra Co-operative Group Ltd	Support in Part	The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported.

Table 1

				<p>However, the 'short-term' language used in the NPS-FM should not preclude (or encumber) the use of the terms such as "long term freshwater objectives", particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term 'targets' to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.</p>
PRFA – Objective 2	PC1-10864	Fulton Hogan Limited	Support in Part	<p>The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to "short term <u>freshwater</u> objectives" to be consistent with the language of the NPS-FM are supported.</p> <p>However, the 'short-term' language used in the NPS-FM should not preclude (or encumber) the use of the terms such as "long term freshwater objectives", particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term 'targets' to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.</p>
PRFA – Objective 2	PC1-3605	GBC Winstone	Support in Part	<p>The River Iwi support the language used in PC1 being consistent with giving effect to Te Ture Whaimana and the NPS-FM 2017. Changes to "short term <u>freshwater</u> objectives" to be consistent with the language of the NPS-FM are supported.</p> <p>However, the 'short-term' language used in the NPS-FM should not preclude (or encumber) the use of the terms such as "long term freshwater objectives", particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term 'targets' to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in Table 3.11-2 become the limits.</p>
PRFA – Objective 2	PC1-10015	Horticulture New Zealand (HortNZ)	Support in Part	<p>The River Iwi could support the insertion of the term "economic" to read "economic and social" hardship, provided the balance and intent of PC1 is maintained in accordance with the matters supported and opposed in the River Iwi submission.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
PRFA – Objective 2	PC1-8907	Miraka Limited	Support in Part	<p>The River Iwi could support the insertion of the term "economic" to read "economic and social" hardship, provided the balance and intent of PC1 is maintained in accordance with the matters supported and opposed in the River Iwi submission.</p> <p>The River Iwi oppose the term "economic hardship". PC1 does not use the term environmental hardship to refer to the Waikato and Waipa River, which arguably have suffered through continual water quality degradation overtime.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
PRFA – Objective 2	PC1-6447	Pouakani Trust	Support in Part	<p>The River Iwi could support the insertion of the term "economic" to read "economic and social" hardship, provided the balance and intent of PC1 is maintained in accordance with the matters supported and opposed in the River Iwi submission.</p>

Table 1

				<p>The River Iwi oppose the term “economic hardship”. PC1 does not use the term environmental hardship to refer to the Waikato and Waipa River, which arguably have suffered through continual water quality degradation overtime.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
PRFA – Objective 2	PC1-8519	Reeves and Taylor, James Gordon Livingston and Amy Louise	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis. The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Reasons for adopting Objective 3				
PRFA – Objective 3	PC1-10168	DairyNZ	Support in Part	<p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits. The numerical attributes states in table 3.11-2 are important in signalling the direction of travel (trajectory) for water quality improvement over time that is required in the Waikato and Waipā River catchments to achieve Te Ture Whaimana in 80-years (by 2096).</p> <p>In this sense the River Iwi believe the short-term targets in Table 3.11-2 (and the trajectory to towards achieving those targets in sub-catchments) should form the basis of mitigation measures that are reasonably required when existing point source discharges of the four contaminants are consented. Similarly if the resource consent duration being sought is greater than 10-years, the overall targets for water quality in Table 3.11-1 should also form part of the consideration in making any decision. It would be a perverse outcome, if a point source discharge avoided reducing discharges of the four contaminants due to a long-term resource consent duration, whereas other land uses were required to continually reduce discharges through Certified Industry Schemes and individual Farm Environment Plans and/or resource consents associated with Farm Environment Plans.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
PRFA – Objective 3	PC1-10623	Fonterra Co-operative Group Ltd	Support in Part	<p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits. The numerical attributes states in table 3.11-2 are important in signalling the direction of travel (trajectory) for water quality improvement over time that is required in the Waikato and Waipā River catchments to achieve Te Ture Whaimana in 80-years (by 2096).</p>

Table 1

				In this sense the River Iwi believe the short-term targets in Table 3.11-2 (and the trajectory to towards achieving those targets in sub-catchments) should form the basis of mitigation measures that are reasonably required when existing point source discharges of the four contaminants are consented. Similarly if the resource consent duration being sought is greater than 10-years, the overall targets for water quality in Table 3.11-1 should also form part of the consideration in making any decision. It would be a perverse outcome, if a point source discharge avoided reducing discharges of the four contaminants due to a long-term resource consent duration, whereas other land uses were required to continually reduce discharges through Certified Industry Schemes and individual Farm Environment Plans and/or resource consents associated with Farm Environment Plans.
PRFA – Objective 3	PC1-10865	Fulton Hogan Limited	Support in Part	<p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits. The numerical attributes states in table 3.11-2 are important in signalling the direction of travel (trajectory) for water quality improvement over time that is required in the Waikato and Waipā River catchments to achieve Te Ture Whaimana in 80-years (by 2096).</p> <p>In this sense the River Iwi believe the short-term targets in Table 3.11-2 (and the trajectory to towards achieving those targets in sub-catchments) should form the basis of mitigation measures that are reasonably required when existing point source discharges of the four contaminants are consented. Similarly if the resource consent duration being sought is greater than 10-years, the overall targets for water quality in Table 3.11-1 should also form part of the consideration in making any decision. It would be a perverse outcome, if a point source discharge avoided reducing discharges of the four contaminants due to a long-term resource consent duration whereas other land uses were required to continually reduce discharges through Certified Industry Schemes and individual Farm Environment Plans and/or resource consents associated with Farm Environment Plans.</p>
PRFA – Objective 3	PC1-3606	GBC Winstone	Support in Part	<p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits. The numerical attributes states in table 3.11-2 are important in signalling the direction of travel (trajectory) for water quality improvement over time that is required in the Waikato and Waipā River catchments to achieve Te Ture Whaimana in 80-years (by 2096).</p> <p>In this sense the River Iwi believe the short-term targets in Table 3.11-2 (and the trajectory to towards achieving those targets in sub-catchments) should form the basis of mitigation measures that are reasonably required when existing point source discharges of the four contaminants are consented. Similarly if the resource consent duration being sought is greater than 10-years, the overall targets for water quality in Table 3.11-1 should also form part of the consideration in making any decision. It would be a perverse outcome, if a point source discharge avoided reducing discharges of the four contaminants due to a long-term resource consent duration, whereas other land uses were required to continually reduce discharges through Certified Industry Schemes and individual Farm Environment Plans and/or resource consents associated with Farm Environment Plans.</p>
PRFA – Objective 3	PC1-10248	Hamilton City Council	Oppose	The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits. The numerical attributes states in table 3.11-2 are important in signalling the direction of travel

Table 1

				<p>(trajectory) for water quality improvement over time that is required in the Waikato and Waipā River catchments to achieve Te Ture Whaimana in 80-years (by 2096).</p> <p>In this sense the River Iwi believe the short-term targets in Table 3.11-2 (and the trajectory to towards achieving those targets in sub-catchments) should form the basis of mitigation measures that are reasonably required when existing point source discharges of the four contaminants are consented. The range of mitigation measures required to achieve compliance with PC1 must be undertaken AT or DURING the time the resource consent is assessed and a decision issued by the consenting authority. Reliance on the ‘goodwill’ of a land use to reduce the discharge of the four contaminants voluntarily and outside of, or following, a resource consent process provides no certainty for River Iwi or the community.</p> <p>It would be a perverse outcome, if a point source discharge avoided reducing discharges of the four contaminants due to a long-term resource consent duration whereas other land uses were required to continually reduce discharges through Certified Industry Schemes and individual Farm Environment Plans and/or resource consents associated with Farm Environment Plans.</p>
PRFA – Objective 3	PC1-10016	Horticulture New Zealand (HortNZ)	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. PC1 already provides for flexibility for land owners to develop Farm Environment Plans to put in place tailored solutions to address critical source areas and to reduce the discharge of the four contaminants from land use.</p> <p>Joint solutions such as catchment collectives/committees and community action groups that achieve the same outcomes as intended by Objective 3 of PC1 are supported by the River Iwi</p>
PRFA – Objective 3	PC1-12313	Oji Fibre Solutions (NZ) Limited	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The CSG spent considerable time designing the structure of the Objectives and principle reasons for adopting each of the objectives in PC1. While the objectives and principle reasons for adoption may require amendment to make PC1 more effective (in achieving the objectives), the River Iwi are comfortable with retaining the principle reasons for adoption at this time.</p> <p>The River Iwi support amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096).</p>
PRFA – Objective 3	PC1-11270	Wairakei Pastoral Ltd	Oppose	<p>The River Iwi oppose the insertion of the wording, “permitted activity rules” in the context of resource consent status for applications that are not low intensity activities or fall outside of Certified Industry Scheme, as this dilutes the intent of PC1.</p> <p>The River Iwi support amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096).</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Reasons for adopting Objective 4				
PRFA – Objective 4	PC1-10017	Horticulture New Zealand (HortNZ)	Support in Part	The River Iwi could support the insertion of the term “economic” to read “minimise economic and social disruption”, provided the balance and intent of PC1 is maintained in accordance with the matters supported and opposed in the River Iwi submission.

Table 1

				The River Iwi oppose the insertion of additional text that prescribes the precise design of permits for non-point source (diffuse) discharges that convey rights to discharge any, or all, of the four contaminants from land use. Resource consents issued on the back of Farm Environment Plans must be hybrid land use resource consents that focus on the implementation (putting in place) mitigation measures that are target towards, and designed to, reduce the discharge of the four contaminants from the use of land. Any such hybrid land use consents must be for a duration 10-years, or must coincide with the 2026 expiry date for PC1 (or agreed date shortly after 2026 to coincide with the next stage of the Healthy Rivers Wai Ora project).
PRFA – Objective 4	PC1-8233	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Oppose	The River Iwi oppose the amendments to remove all consideration for minimising economic and social disruption and consider the staged approach —to achieving Te Ture Whaimana— is a logical response to sequencing change over time, and it is important to signal that future changes will be required to achieve Te Ture Whaimana. Furthermore, objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and should not be deleted.
PRFA – Objective 4	PC1-11271	Wairakei Pastoral Ltd	Oppose	The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened. While the introduction of collective and sub-catchment groups to achieve demonstrable water quality improvements at scale is supported by the River Iwi, the addition of new wording to create a pathway for sub-catchment resource consenting is opposed. PC1 establishes a pathway for properties and enterprises that are not low intensity activities to either develop Farm Environment Plans or be part of a Certified Industry Scheme and sub-catchment resource consenting duplicates this approach. The River Iwi are clear, the use of discharge permits to establish (and lock in) rights to discharge any or all of the four contaminants for durations longer than 10-years —and ahead of future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4) post 2026— are opposed.

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Reasons for adopting Objective 5				
PRFA – Objective 5	PC1-4723	Reeves, John	Oppose	The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc). The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.

Table 1

PRFA – Objective 5	PC1-8235	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
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Table 1

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
3.11.3 Policies/Ngā Kaupapa Here				
Policies - General	PC1-11484	Beef + Lamb New Zealand Limited	Support in Part	<p>River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The River Iwi are comfortable the long-term and short-term freshwater objectives are based on the mix of values expressed in 3.11.1, including the consumptive values ascribed to Mana Tangata.</p> <p>River Iwi agree that where the water quality targets in Table 3.11-1 for each sub-catchment have been met (and are effectively limits), a new policy 1A would be appropriate to set out that water quality needs to be managed within the limits. The River Iwi note WRC need to design and put in place a robust accounting framework that is capable of accounting for the discharge of contaminants from land use PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (eg, edge of field mitigations etc). The accounting framework would be pivotal in managing within limits</p> <p>PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM. The River Iwi consider the 'short-term' language used in the NPS-FM should not preclude (or encumber) the use of the terms such as "long term freshwater objectives", particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p> <p>Amendments to strengthen the intent of PC1 to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are supported by River Iwi.</p>
Policies - General	PC1-6590	Clune, Grant William John	Oppose	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits for longer than 10-years.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p>
Policies - General	PC1-10639	Department of Conservation	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. The River Iwi are comfortable the trajectory of water quality improvement will assist with</p>

Table 1

				improving ecosystem in the Waikato and Waipā River catchments. However, River Iwi would support strengthening of policies and methods to ensure the habitat of indigenous species are safeguarded.
Policies - General	PC1-11176	Fertiliser Association of New Zealand	Oppose	<p>The River Iwi oppose the insertion of additional policies that prescribes the precise design of permits for non-point source (diffuse) discharges that convey rights to discharge any or all of the four contaminants from land use. Resource consents issued on the back of Farm Environment Plans must be hybrid land use resource consents that focus on the implementation (putting in place) mitigation measures that are target towards, and designed to, reduce the discharge of the four contaminants.</p> <p>The River Iwi are clear, the use of discharge permits to establish (and lock in) rights to discharge any or all of the four contaminants for durations longer than 10-years —and ahead of future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4) post 2026— are opposed. The risk of locking in existing rights to discharge the four contaminants for between 20-35 years (and avoidance of making further signalled reductions post 2026) is carried by the Waikato and Waipā Rivers.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Policies - General	PC1-10748	Fulton Hogan Limited	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised by point source discharges when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment, demonstrate a net reduction in the contaminant (to be reduced through any external offset) and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>The proposed split of “Best Practicable Option” from offsets and as separate policies may be workable provided WRC design and develop an accounting framework that is capable of attributing the offset [reduction in the discharge of contaminants] from the nominated property/enterprise and balance across the principle point source discharge.</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>
Policies - General	PC1-10259	Hamilton City Council	Oppose	<p>The River Iwi oppose new policy 5a as the Regional Plan and Regional Policy Statement already provides for urban growth within the Waikato Region and there is no justification for a new and duplicate policy in PC1. Collectively, urban land uses need to demonstrate they are making a contribution to the reduction in the discharge of the four contaminants and assisting to achieve Te Ture Whaimana in 80-years (by 2096).</p> <p>The River Iwi oppose new policy 10a and 12a as PC1 already provides a generous policy framework to manage point source discharges of the four contaminants. The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant</p>

Table 1

				<p>infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi also oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policies - General	PC1-11215	Lawson, John	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits for longer than 10-years.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p> <p>The River Iwi agree PC1 should avoid an ‘overs and unders’ approach that is provided for through the NPS-FM — overall water quality— at the FMU scale. To assist with avoiding any risk of this approach, the WRC need to design and put in place a robust accounting framework that is capable of accounting for the discharge of contaminants from land use (properties and enterprises) and recording the mitigation measures that are put in place to reduce contaminant discharges.</p>
Policies - General	PC1-8318	McGovern, Annette	Support in Part	<p>The proposed use of stocking rate (and the method to determine stock units in PC1) requires amendment for consistency and workability. It is unclear if stock unit is a “wintered stock unit” or an “annual average stock unit”. The River Iwi consider a definition of stock unit is required in the Glossary that is consistent with what is used in the farming industry. Objectives, Policies, Methods and Schedules contained in PC1 that refer to “stock unit” will need to be consequentially amended to be consistent with the new definition.</p>
Policies - General	PC1-175	Okell, Robert Steven	Oppose	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits for longer than 10-years.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p>
Policies - General	PC1-10121	Ravensdown Limited	Oppose	<p>The River Iwi oppose the insertion of additional policies that prescribes the precise design of permits for non-point source (diffuse) discharges that convey rights to discharge any or all of the four contaminants from land use. Resource consents issued on the back of Farm Environment Plans must be hybrid land use resource consents that</p>

Table 1

				<p>focus on the implementation (putting in place) mitigation measures that are target towards, and designed to, reduce the discharge of the four contaminants.</p> <p>The River Iwi are clear, the use of discharge permits to establish (and lock in) rights to discharge any or all of the four contaminants for durations longer than 10-years —and ahead of future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4) post 2026— are opposed. The risk of locking in existing rights to discharge the four contaminants for between 20-35 years (and avoidance of making further signalled reductions post 2026) is carried by the Waikato and Waipā Rivers.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Policies - General	PC1-5156	Stark, Steven and Theresa	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis. The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community.</p> <p>Amendments proposed to lengthen the timeframe to achieve Objective 3 (by 2026) and Te Ture Whaimana (Objective 1 by 2096) are opposed by the River Iwi.</p>
Policies - General	PC1-10288	Volker, Peter	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants.</p> <p>The River Iwi consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain or improve overall water quality”. PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, as opposed to being flat lined at the “national bottom line” standards set out in the NPS-FM.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 and this could include further refinement of reasons for Objective 3, however the reference to the NPS-FM wording ‘overall’ is not supported.</p>
Policies - General	PC1-11560	Waikato River Authority	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants.</p>

Table 1

				<p>The River Iwi consider PC1 must give effect to Te Ture Whaimana and the NPS-FM. Where there are inconsistencies, Te Ture Whaimana prevails over the NPS-FM and this includes using the language “restore and protect” as opposed to “maintain or improve overall water quality.”</p> <p>The River Iwi support amendments which strengthen the intent of PC1 and this could include further refinement of reasons for Objective 3, however the reference to the NPS-FM wording ‘overall’ is not supported.</p>
Policies - General	PC1-4705	Waipapa Farms Ltd and Carlyle Holdings Ltd	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants.</p> <p>The proposed use of stocking rate (and the method to determine stock units in PC1) requires amendment for consistency and workability. It is unclear if stock unit is a “wintered stock unit” or an “annual average stock unit”. The River Iwi consider a definition of stock unit is required in the Glossary that is consistent with what is used in the farming industry. Objectives, Policies, Methods and Schedules contained in PC1 that refer to “stock unit” will need to be consequentially amended to be consistent with the new definition.</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens/Te Kaupapa Here 1: Te whakahaere i ngā rukenga roha o te hauota, o te pūtūtae-whetū, o te waiparapara me te tukumate ora poto				
Policy 1 – Manage diffuse discharges	PC1-10875	Auckland/Waikato Fish and Game	Oppose	<p>The River Iwi oppose the amendments to (a) as the addition of the word “through permitted activities” is not required. In any event Policy 4 enables activities with lower discharges to continue. The River Iwi considers repeating Part II of the RMA is largely redundant as the Regional Plan must give effect to Part II of the RMA. PC1 will address the adverse effects of cumulative discharges from land based activities within the Waikato and Waipā River catchments through tailored design of mitigation actions being put in place on land to reduce the discharge of the four contaminants.</p> <p>The River Iwi note PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits, and for longer than 10-years. Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p>
Policy 1 – Manage diffuse discharges	PC1-11399	Balle Bros Group	Support in Part	<p>The River Iwi do not support the amendments and prefer the directive language “manage and require reductions” and consider this has a causal link to Objective 1 and 3 and Tables 3.11-1 and 3.11-2. The River Iwi would support</p>

Table 1

				<p>amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096).</p> <p>The proposed amendments to (c) and new (d) are not required as stock exclusion from waterways is set out in Schedule C of PC1. The River Iwi consider the sum-total of mitigation actions that are put in place on properties and enterprises across the Waikato and Waipā River catchment (including stock exclusion where applicable) must be equal to or exceed the Objective 3 by 2026.</p> <p>The River Iwi support the requirement to use a risk based framework to target critical source areas and design tailored mitigation measures that will assist with achieving Objective 3 in 10-years (by 2026).</p>
Policy 1 – Manage diffuse discharges	PC1-1660	Barton, Rachel and Jonathan	Oppose	<p>The proposed amendments to (c) and new (d) are not required as stock exclusion from waterways is set out in Schedule C of PC1. The River Iwi consider the sum-total of mitigation actions that are put in place on properties and enterprises across the Waikato and Waipā River catchment (including stock exclusion where applicable) must be equal to or exceed the Objective 3 by 2026.</p>
Policy 1 – Manage diffuse discharges	PC1-11485	Beef + Lamb New Zealand Limited	Oppose	<p>The River Iwi oppose the deletion of Policy 1 would in effect combine the intent of policy 1, 2, 3 (for horticultural production systems) and 4 together. The River iwi prefer the current structure of policies and would support amendments to strengthen the intent of the individual policies.</p> <p>The River Iwi note PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits, and for longer than 10-years. Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p>
Policy 1 – Manage diffuse discharges	PC1-1379	Buckley, Peter Ross	Oppose	<p>The proposed amendments to (c) and new (d) are not required as stock exclusion from waterways is set out in Schedule C of PC1. The River Iwi consider the sum-total of mitigation actions that are put in place on properties and enterprises across the Waikato and Waipā River catchment (including stock exclusion where applicable) must be equal to or exceed the Objective 3 by 2026.</p>
Policy 1 – Manage diffuse discharges	PC1-6226	Cameron, Bruce	Oppose	<p>The proposed amendments to (c) and new (d) are not required as stock exclusion from waterways is set out in Schedule C of PC1. The River Iwi consider the sum-total of mitigation actions that are put in place on properties and enterprises across the Waikato and Waipā River catchment (including stock exclusion where applicable) must be equal to or exceed the Objective 3 by 2026.</p>
Policy 1 – Manage diffuse discharges	PC1-10776	CNI Iwi Land Management Limited	Support in part	<p>The River Iwi opposes the amendments to the policy header to remove “require reductions” and considers the term “manage” is not sufficient to convey the policy intent of PC1 [to achieve Te ure Whaimana in 80-years (by 2096)].</p> <p>Amendments to remove the wording “provided those discharges do not increase” is opposed by River Iwi, as low intensity activities need to be managed at their current low discharge state. Added to which, Policy 4 signals the need for low discharge uses to prepare for reductions in contaminant discharges in the future (post 20267). This signal needs to remain in the PC1 architecture.</p>

Table 1

Policy 1 – Manage diffuse discharges	PC1-10196	Dairy NZ	Support in Part	<p>The header of policy 1 is explicit in dealing with only diffuse sources of contaminants and the word “diffuse” is not required in (a). It is unclear what “or a managed low risk” actually means in practice.</p> <p>The proposed bullet points in (b)(ii) place a spotlight on solely nitrogen, which is one of three contaminants that are discharged from land use. The reduction of nitrogen discharges should not be the single focus of PC1.</p> <p>The River Iwi consider Policy 2 and 3 already provides for the “tailored” design of Farm Environment Plans —or through a Certified Industry Scheme— to identify mitigation measures that would target critical source areas using a risk based approach to ultimately reduce the discharge of contaminants from farming systems and horticulture production systems and assist with achieving Objective 3. Therefore amendments to (b) may not required.</p>
Policy 1 – Manage diffuse discharges	PC1-9707	Fertiliser Association of New Zealand	Support in part	<p>The River Iwi opposes the amendments to the policy header to remove “require reductions” and considers the term “manage” is not sufficient to convey the policy intent of PC1 [to achieve Te ure Whaimana in 80-years (by 2096)].</p> <p>The header of policy 1 is explicit in dealing with only diffuse sources of contaminants and the word “diffuse” is not required in (a). The River Iwi can support the inclusion of the terms “over-allocated” where water quality targets in Table 3.11-2 are not met in respective sub-catchments.</p> <p>The River Iwi oppose the addition to (b) as it is not required and makes the policy more ambiguous.</p> <p>The River Iwi would support amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096).</p>
Policy 1 – Manage diffuse discharges	PC1-5892	Fletcher Trust	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis.</p> <p>Amendments proposed to policy 1 for activities with a low level of contaminant discharge to continue needs to be conditioned by policy 4 (signalling future change), however must also be framed with the conditioning that these activities can continue provided they do not increase their contaminant discharge.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Policy 1 – Manage diffuse discharges	PC1-10469	Fonterra Co-operative Group Ltd	Support in Part	<p>Amendments proposed to policy 1 for activities with a low level of contaminant discharge to continue operating — provided they do not increase their contaminant discharge— that are conditioned by policy 4 [signalling future change] are supported by the River Iwi.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Policy 1 – Manage diffuse discharges	PC1-6428	Gleeson, Graeme B	Support in Part	<p>The specific targets to achieve the short-term freshwater objectives in 10-years are reasonably necessary to enable monitoring of plan effectiveness and give certainty to the community that the region is on the path to achieve Te Ture Whaimana in 80-years (2096). The concept of gaining a greater understanding of spatial differences across the region underpins the need to adopt an approach which generates high quality information from land use. The</p>

Table 1

				<p>methods to achieve this range from registration through the reference point information on N loss to Farm Environment Planning.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096) or sooner where practicable.</p>
Policy 1 – Manage diffuse discharges	PC1-2910	Greenplan Holdings Limited	Support in Part	<p>The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community. Progressively excluding stock from accessing the banks and beds of waterbodies was viewed by the CSG as an obvious mitigation measure to reduce the discharge of contaminants from land use.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Policy 1 – Manage diffuse discharges	PC1-5378	Hancock Forest Management (NZ) Ltd	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community.</p> <p>Policy 1 deals explicitly with diffuse sources of contaminants and the suggested use of the term “best practicable option for farming activities”, assumes those activities should be treated as point source discharges. This is because the application “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges.</p> <p>Notwithstanding the argument that “best practicable option” may not equate to Te Ture Whaimana in 80-years (by 2096), the use of the “best practicable option” by land owners on such a scale (and then the assessment required by WRC on a consent by consent basis) may not be feasible. River Iwi oppose this amendment.</p> <p>The River Iwi note PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits, and for longer than 10-years. Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p> <p>Amendments to objectives that fundamentally strengthen PC1 and the outcome of achieving Te Ture Whaimana by 2096 are supported by the River Iwi.</p>
Policy 1 – Manage diffuse discharges	PC1-7713	Hill Country Farmers Group	Support in Part	<p>The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community. Progressively excluding stock from accessing the banks and beds of waterbodies was viewed by the CSG as an obvious mitigation measure to reduce the discharge of contaminants from land use.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>

Table 1

Policy 1 – Manage diffuse discharges	PC1-10050	Horticulture New Zealand (HortNZ)	Support in Part	<p>The introduction of collective groups to manage the reduction of discharges is supported where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p> <p>The River Iwi considers there could be merit in identifying 10-year sub-catchment load targets for sub-catchments provided this information assists to achieving Objective 3 in 10-years (by 2026). However the validity of the targets needs to be assessed by technical experts and compared with Tables 3.11-1 and 3.11-2.</p> <p>The River Iwi agree that WRC need to design and put in place a robust accounting framework that is capable of accounting for the discharge of contaminants from land use (properties and enterprises) and recording the mitigation measures that are ut in place to reduce contaminant discharges.</p>
Policy 1 – Manage diffuse discharges	PC1-6961	Jodean Farms	Support in Part	<p>PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits or land use resource consents for longer than 10-years.</p> <p>The problem with providing a uniform 15kg/ha/N/yr figure across all properties and enterprises is the reduction target for nitrogen within most sub-catchments would likely be increased. If the same logic was used for sediment and phosphorus the River Iwi could foresee a situation where Te Ture Whaimana is not achieved. This would be an unacceptable outcome for the awa and for River iwi.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process. For the purpose of clarity River Iwi do not support a pure grand parented approach to allocating rights to discharge.</p>
Policy 1 – Manage diffuse discharges	PC1-1786	Kilgour, Gareth	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana and MUST BE RETAINED and/or strengthened.</p> <p>The water quality targets set out in Table 3.11-1 and the 80-year staged approach to achieving Te Ture Whaimana takes into account the balance between the environment and peoples cultural, social and economic wellbeing. While the River Iwi agree that everyone needs to contribute to address water quality problems —both urban and rural—, Policy 1 explicitly deals with diffuse sources of contaminants and amendments to include point sources are not required.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>

Table 1

				The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096) or sooner where practicable.
Policy 1 – Manage diffuse discharges	PC1-8810	Miraka Limited	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. PC1 already provides for flexibility for land owners to develop Farm Environment Plans to put in place tailored solutions to address critical source areas and to reduce the discharge of the four contaminants from land use. The development of Farm Environment Plans will need to be cognisant of the water quality limits set out in Table 3.11-2 when mitigation measures are selected and should record any applicable historical measures that have been undertaken to reduce the risks of pastoral operations (eg, pole planting undertaken, retirement of gully system etc).</p> <p>Best Management Practice (BMP) and Good Management Practice (GMP) is already defined in PC1 and will form an integral part of Farm Environment Plans. The River Iwi note there will be a transition over time from GMP to BMP.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096) or sooner where practicable.</p>
Policy 1 – Manage diffuse discharges	PC1-4287	Moerangi Trust	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. PC1 already provides for flexibility for land owners to develop Farm Environment Plans to put in place tailored solutions to address critical source areas and to reduce the discharge of the four contaminants from land use.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096) or sooner where practicable.</p>
Policy 1 – Manage diffuse discharges	PC1-4829	NZ Transport Agency	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. While the River Iwi agree that everyone needs to contribute to address water quality problems — both urban and rural —, Policy 1 explicitly deals with diffuse sources of contaminants and amendments to ‘from farming activities’ may not be required.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096) or sooner where practicable.</p>
Policy 1 – Manage diffuse discharges	PC1-6855	Muir, Mark	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis.</p> <p>The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community. Progressively excluding stock from accessing the banks and beds of waterbodies was viewed by the CSG as an obvious mitigation measure to reduce the discharge of contaminants from land use.</p>

Table 1

				The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)
Policy 1 – Manage diffuse discharges	PC1-6395	Oji Fibre Solutions (NZ) Limited	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community.</p> <p>Policy 1 deals explicitly with diffuse sources of contaminants and the suggested use of the term “best practicable option for farming activities”, assumes those activities should be treated as point source discharges. This is because the application “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges.</p> <p>Notwithstanding the argument that “best practicable option” may not equate to Te Ture Whaimana in 80-years (by 2096), the use of the “best practicable option” by land owners on such a scale (and then the assessment required by WRC on a consent by consent basis) may not be feasible. River Iwi oppose this amendment.</p> <p>The River Iwi note PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits, and for longer than 10-years. Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p> <p>Amendments to objectives that fundamentally strengthen PC1 and the outcome of achieving Te Ture Whaimana by 2096 are supported by the River Iwi.</p>
Policy 1 – Manage diffuse discharges	PC1-6283	Pouakani Trust	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants to achieve the short-term freshwater objectives by 2026. PC1 already provides for flexibility for land owners to develop Farm Environment Plans to put in place tailored solutions to address critical source areas and to reduce the discharge of the four contaminants from land use.</p> <p>Best Management Practice (BMP) and Good Management Practice (GMP) is already defined in PC1 and will form an integral part of Farm Environment Plans. Amendments to Policy 1 to include reference to GMP are not required.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096) or sooner where practicable.</p>
Policy 1 – Manage diffuse discharges	PC1-11143	Primary Land Users Group	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis.</p>

Table 1

				<p>The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community. Progressively excluding stock from accessing the banks and beds of waterbodies was viewed by the CSG as an obvious mitigation measure to reduce the discharge of contaminants from land use.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Policy 1 – Manage diffuse discharges	PC1-10101	Ravensdown Limited	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The CSG spent considerable time designing the structure of the objectives and policies in PC1. The amendments proposed say the same thing in a different way and only really add the term over-allocated. The direct language “manage and require reductions” is directive and has a causal link to Objective 1 and 3 and Tables 3.11-1 and 3.11-2. The River Iwi prefer the original wording of policy 1, but would support amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096).</p>
Policy 1 – Manage diffuse discharges	PC1-3146	Riverheads Ltd	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The CSG spent considerable time designing the structure of the objectives and policies in PC1. While the objectives and policies may require refinement and amendment to make PC1 more effective (in achieving the objectives), the River Iwi are opposed to deleting the objectives and policies.</p> <p>The River Iwi support amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096).</p>
Policy 1 – Manage diffuse discharges	PC1-1126	Shabor Ltd	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants and included working on a priority sub-catchment basis. The 80-year timeframe to achieve Te Ture Whaimana reflects the balance between the environment and maintaining the economic, social, spiritual and cultural wellbeing of the regional community.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096)</p>
Policy 1 – Manage diffuse discharges	PC1-5077	Stark, Steven and Theresa	Oppose	<p>The River Iwi do not support the amendments and prefer the directive language “manage and require reductions” and consider this has a causal link to Objective 1 and 3 and Tables 3.11-1 and 3.11-2. The River Iwi would support amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096).</p>
Policy 1 – Manage diffuse discharges	PC1-3273	Timberlands Limited	Oppose	<p>The River Iwi do not support the amendments and prefer the directive language “manage and require reductions” and consider this has a causal link to Objective 1 and 3 and Tables 3.11-1 and 3.11-2. The River Iwi would support amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096).</p>

Table 1

Policy 1 – Manage diffuse discharges	PC1-5769	Treweek, Glen	Oppose	The River Iwi do not support the amendments and prefer the directive language “manage and require reductions” and consider this has a causal link to Objective 1 and 3 and Tables 3.11-1 and 3.11-2. The River Iwi would support amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096).
Policy 1 – Manage diffuse discharges	PC1-6780	Twining, Murray Ian and Robyn Joy	Oppose	The proposed amendments to (c) and new (d) are not required as stock exclusion from waterways is set out in Schedule C of PC1. The River Iwi consider the sum-total of mitigation actions that are put in place on properties and enterprises across the Waikato and Waipā River catchment (including stock exclusion where applicable) must be equal to or exceed the Objective 3 by 2026.
Policy 1 – Manage diffuse discharges	PC1-3791	Verry, Reon and Wendy	Oppose	The River Iwi do not support the amendments to dilute the intent of policy 1 and prefer the directive language “manage and require reductions” and consider this has a causal link to Objective 1 and 3 and Tables 3.11-1 and 3.11-2. The River Iwi would support amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096).
Policy 1 – Manage diffuse discharges	PC1-11272	Wairakei Pastoral Ltd	Oppose	The River Iwi do not support the amendments to dilute the intent of policy 1 and prefer the directive language “manage and require reductions” and consider this has a causal link to Objective 1 and 3 and Tables 3.11-1 and 3.11-2. The River Iwi would support amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096). The River Iwi oppose the granting resource consents for long-term duration simply locks in perceived rights to discharge contaminants, and avoids sectors needing to make necessary reductions of contaminants to assist with achieving Te Ture Whaimana. Such an outcome —25-year duration resource consents that lock in perceived rights to discharge— is unacceptable to River Iwi as the Waikato and Waipā Rivers will continue bear the cost of inaction.
Policy 1 – Manage diffuse discharges	PC1-2084	Wairarapa Moana Incorporation	Support in Part	The River Iwi consider all properties and enterprises should be operating using Good Management Practice (GMP) or be at Best Management Practice (BMP). It is important to note that GMP/BMP may not, in all cases, be the ‘silver bullet’ solution to address water quality problems and achieve Te Ture Whaimana in 80-years (by 2096).
Policy 1 – Manage diffuse discharges	PC1-11528	Yule, Don, Lauris and Yvette	Oppose	The proposed amendments to (c) and new (d) are not required as stock exclusion from waterways is set out in Schedule C of PC1. The River Iwi consider the sum-total of mitigation actions that are put in place on properties and enterprises across the Waikato and Waipā River catchment (including stock exclusion where applicable) must be equal to or exceed the Objective 3 by 2026.

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 2: Tailored approach to reducing diffuse discharges from farming activities/Te Kaupapa Here 2: He huarahi ka āta whakahāngaihia hei whakaiti i ngā rukenga roha i ngā mahinga pāmu				

Table 1

Policy 2 – Tailored approach for farming systems	PC1-7656	Auckland/Waikato Fish and Game	Support in Part	Policy 2 requires a tailored approach to the reduction of diffuse discharges of contaminants from farming activities. The River Iwi support the existing wording “that will reduce”. While River Iwi are comfortable with the proportionate language in (d), the proposed amendments to insert “in accordance with the short-term targets in Table 3.11-1, the sub-catchment reduction targets and timeframes in Table 3.11-2” or similar wording would be supported by the River Iwi.
Policy 2 – Tailored approach for farming systems	PC1-6616	Awaroa Lands Ltd	Oppose	The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment. In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.
Policy 2 – Tailored approach for farming systems	PC1-9019	Bailey, James	Oppose	The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment. In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.
Policy 2 – Tailored approach for farming systems	PC1-6862	Ballance Agri-Nutrients Limited	Support in Part	The proposed amendments to (d) to require farm environment plans to identify risks and put in place mitigation actions are similar to (b) and would not add anything of substance to Policy 2. While River Iwi support the preparation of Farm Environment Plans and the identification of mitigation actions that reduce contaminant discharges, the proposed amendment to rely on best or good management practice is opposed. It is unlikely that best or good management practice will be sufficient to achieve Objective 3 short-term water quality targets across all commercial vegetable production systems.
Policy 2 – Tailored approach for farming systems	PC1-11401	Balle Bros Group	Oppose	PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “where relevant” or “where required”. The proposed amendments and replacement of this language in (a) and (d) are opposed by River Iwi. The proposed deletion or significant modification of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.

Table 1

				In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.
Policy 2 – Tailored approach for farming systems	PC1-11487	Beef + Lamb New Zealand Limited	Support in part	<p>The River Iwi would not oppose the amendments to (d) provided that properties and enterprises made the reductions in the discharge of contaminants necessary to achieve Objective 3 in 10-years (by 2026). All properties and enterprises need to make proportionate and demonstrable water quality improvements in sub-catchments to assist with achieving Te Ture Whaimana.</p> <p>Policy 2 deals explicitly with diffuse sources of contaminants and the suggested use of the term “best practicable option for farming activities”, assumes those activities should be treated as point source discharges. This is because the application of “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges.</p>
Policy 2 – Tailored approach for farming systems	PC1-2541	Buckley, Carol	Oppose	<p>PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “where relevant” or “where required”. The proposed amendments and replacement of this language in (a) and (d) are opposed by River Iwi.</p> <p>The proposed deletion or significant modification of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-1397	Buckley, Peter Ross	Oppose	<p>PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “where relevant” or “where required”. The proposed amendments and replacement of this language in (a) and (d) are opposed by River Iwi.</p> <p>The proposed deletion or significant modification of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-5539	Chhagn Bros Co Ltd	Oppose	<p>PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “where relevant” or “where required”. The proposed amendments and replacement of this language in (a) and (d) are opposed by River Iwi.</p>

Table 1

				<p>The proposed deletion or significant modification of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-9704	Craig, Jeffery	Oppose	<p>PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “where relevant” or “where required”. The proposed amendments and replacement of this language in (a) and (d) are opposed by River Iwi.</p> <p>The proposed deletion or significant modification of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-10198	Dairy NZ	Support in Part	<p>The deletion of the words “that will reduce” from (a) is opposed by the River Iwi. The use of the language “take a tailored, risk based approach to” in the absence of “require reductions” does not send the right policy signals that diffuse sources of contaminant discharges from farming systems need to be reduced over time.</p> <p>The amendments to (d) to remove the words “amount” and replace with “risk” is starting to duplicate (a) where a “risk based approach” is taken in tailoring farm environment plans and is not supported by River Iwi.</p> <p>The addition of the words “leaving a property from overland flow of leaching below the root zone” may be a useful addition to make it clear how contaminants are diffusely discharged and could be supported by River Iwi.</p> <p>While the introduction of collective and sub-catchment groups to achieve demonstrable water quality improvements at scale is supported, the addition of new (e) is opposed by River Iwi. PC1 establishes a pathway for properties and enterprises that are not low intensity activities to either develop Farm Environment Plans or be part of a Certified Industry Scheme. New (e) changes this pathway and infers a new sub-catchment plan structure which is undefined and unlimited in scope. The River Iwi consider there is a risk that new structures will create loopholes for properties and enterprises to avoid reducing the discharge of contaminants to assist with achieving Objective 3 and, ultimately Te Ture Whaimana.</p>
Policy 2 – Tailored approach for farming systems	PC1-10646	Department of Conservation	Oppose	<p>The River Iwi do not support the amendments to (a) and prefer the directive language “manage and require reductions” and consider this has a causal link to Objective 1 and 3 and Tables 3.11-1 and 3.11-2. The River Iwi would support amendments that would strengthen the intent of PC1 to achieve the short-term water quality objectives in 10-years (by 2026) and ultimately achieve Te Ture Whaimana in 80-years (by 2096).</p>

Table 1

Policy 2 – Tailored approach for farming systems	PC1-641	Dunlop, Tania	Oppose	<p>PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipā River catchments, not just “where relevant” or “where required”. The proposed amendments and replacement of this language in (a) and (d) are opposed by River Iwi.</p> <p>The proposed deletion or significant modification of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-1161	Eight Mile Farms Ltd	Oppose	<p>The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 2 MUST BE RETAINED and/or strengthened.</p>
Policy 2 – Tailored approach for farming systems	PC1-10816	Federated Farmers of New Zealand	Oppose	<p>PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits or land use resource consents for longer than 10-years. The problem with providing a uniform 15kg/ha/N/yr figure across all properties and enterprises is the reduction target for nitrogen within most sub-catchments would likely be increased. If the same logic was used for sediment and phosphorus the River Iwi could foresee a situation where Te Ture Whaimana is not achieved. This would be an unacceptable outcome for the awa and for River Iwi.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process. For the purpose of clarity River Iwi do not support a pure grand parented approach to allocating rights to discharge.</p> <p>The River Iwi oppose new (f)(i), (ii), (iii) and (iv) as the granting resource consents for long-term duration simply locks in perceived rights to discharge contaminants ,and avoids sectors needing to make necessary reductions of contaminants to assist with achieving Te Ture Whaimana. Such an outcome —25-year duration resource consents that lock in perceived rights to discharge— is unacceptable to River Iwi as the Waikato and Waipā Rivers will continue bear the cost of inaction.</p>
Policy 2 – Tailored approach for farming systems	PC1-9712	Fertiliser Association of New Zealand	Oppose	<p>The amendment to delete “and require reductions” and “reduce” in (a) is opposed by River Iwi. Policy 2 is directive and is clear that then intention of methods is to require reductions of diffuse source contaminants from properti4es and enterprises. The deletion of the word “reduce” dilutes the intent of Policy 2.</p> <p>In respect of proposed new (d), the River Iwi consider all properties and enterprises should be operating using Good Management Practice (GMP) or be at Best Management Practice (BMP). It is important to note that GMP/BMP may not,</p>

Table 1

				in all cases, be the ‘silver bullet’ solution to address water quality problems and achieve Te Ture Whaimana in 80-years (by 2096).
Policy 2 – Tailored approach for farming systems	PC1-10470	Fonterra Co-operative Group Ltd	Support in Part	<p>While the River Iwi consider the proposed amendments to (a) place a spotlight on solely nitrogen, which is one of three contaminants that are discharged from land use. The reduction of nitrogen discharges should not be the single focus of PC1.</p> <p>The proposed bullet points in (a)(ii) preface the 75th percentile rule in the policies which is largely redundant as the framing of PC1 already provides the pathway for dairy properties to determine a nitrogen reference point (NRP), be ranked by WRC to ascertain the 75th percentile and then to make necessary reductions of nitrogen. However, if this approach is determined to provide further clarity then the River Iwi would support this.</p> <p>The River Iwi note the existing approach in Policy 2 provides for the “tailored” design of Farm Environment Plans —or through a Certified Industry Scheme— to identify mitigation measures that would target critical source areas using a risk based approach to ultimately reduce the discharge of contaminants from properties and enterprises and assist with achieving Objective 3.</p>
Policy 2 – Tailored approach for farming systems	PC1-6409	Gleeson, Graeme B	Oppose	<p>PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “where relevant” or “where required”. The proposed amendments and replacement of this language in (a) and (d) are opposed by River Iwi.</p> <p>The proposed deletion or significant modification of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p> <p>PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits for longer than 10-years.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p> <p>For the purpose of clarity River Iwi do not support a pure grand parented approach to allocating rights to discharge</p>
Policy 2 – Tailored approach for farming systems	PC1-2918	Greenplan Holdings Limited	Oppose	<p>PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “where relevant” or “where required”. The proposed amendments and replacement of this language in (a) and (d) are opposed by River Iwi.</p>

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Policy 2 – Tailored approach for farming systems	PC1-5387	Hancock Forest Management (NZ) Ltd	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>Policy 2 deals explicitly with diffuse sources of contaminants and the suggested use of the term “best practicable option for farming activities”, assumes those activities should be treated as point source discharges. This is because the application of “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges.</p>
Policy 2 – Tailored approach for farming systems	PC1-7719	Hill Country Farmers Group	Oppose	<p>PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “where relevant” or “where required”. The proposed amendments and replacement of this language in (a) and (d) are opposed by River Iwi.</p> <p>The proposed deletion or significant modification of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-4020	Hira Bhana and Co Ltd	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p>

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Policy 2 – Tailored approach for farming systems	PC1-4556	Holmes, Gavin	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-5865	Huirimu Farms Ltd	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-6967	Jodean Farms	Oppose	<p>PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits or land use resource consents for longer than 10-years. The problem with providing a uniform 15kg/ha/N/yr figure across all properties and enterprises is the reduction target for nitrogen within most sub-catchments would likely be increased. If the same logic was used for sediment and phosphorus the River Iwi could foresee a situation where Te Ture Whaimana is not achieved. This would be an unacceptable outcome for the awa and for River iwi.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process. For the purpose of clarity River Iwi do not support a pure grand parented approach to allocating rights to discharge.</p>
Policy 2 – Tailored approach for farming systems	PC1-5276	Living Foods Ltd	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p>

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				In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.
Policy 2 – Tailored approach for farming systems	PC1-9301	Matira Sub Catchment Group	Oppose	The CSG agreed a sequenced and staged approach to achieving the Te Ture Whaimana over the 80-year timeframe. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 2 MUST BE RETAINED and/or strengthened.
Policy 2 – Tailored approach for farming systems	PC1-18312	McGovern, Annette	Oppose	The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment. In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.
Policy 2 – Tailored approach for farming systems	PC1-8811	Miraka Limited	Oppose	In respect of proposed amendments to (d), the River Iwi consider all properties and enterprises should be operating using Good Management Practice (GMP) or be at Best Management Practice (BMP). It is important to note that GMP/BMP may not, in all cases, be the ‘silver bullet’ solution to address water quality problems and achieve Te Ture Whaimana in 80-years (by 2096).
Policy 2 – Tailored approach for farming systems	PC1-6857	Muir, Mark	Oppose	The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment. In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.
Policy 2 – Tailored approach for farming systems	PC1-8750	Nelson Farms Partnership	Oppose	The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment. In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.

Table 1

Policy 2 – Tailored approach for farming systems	PC1-6397	Oji Fibre Solutions (NZ) Limited	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>Policy 2 deals explicitly with diffuse sources of contaminants and the suggested use of the term “best practicable option for farming activities”, assumes those activities should be treated as point source discharges. This is because the application of “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges.</p>
Policy 2 – Tailored approach for farming systems	PC1-4185	Perfect Produce Co Ltd	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-6285	Pouakani Trust	Oppose	<p>In respect of proposed amendments to (d), the River iwi consider all properties and enterprises should be operating using Good Management Practice (GMP) or be at Best Management Practice (BMP). It is important to note that GMP/BMP may not, in all cases, be the ‘silver bullet’ solution to address water quality problems and achieve Te Ture Whaimana in 80-years (by 2096).</p>
Policy 2 – Tailored approach for farming systems	PC1-11144	Primary Land Users Group	Oppose	<p>PC1 was also developed using the best available scientific information which indicates water quality will need to be restored and protected throughout the Waikato and Waipa River catchments, not just “where relevant” or “where required”. The proposed amendments and replacement of this language in the header to policy 2, (a) and (d) are opposed by River Iwi.</p>
Policy 2 – Tailored approach for farming systems	PC1-7779	Pukekohe Vegetable Growers Association Inc (PVGA)	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>

Table 1

Policy 2 – Tailored approach for farming systems	PC1-4797	Pukerimu Farms Limited	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-10102	Ravensdown Limited	Oppose	<p>The deletion of (a) and (b) are opposed by River Iwi as the language “Taking a tailored approach” reflects the differences between sub-catchment and recognises ‘off-the-shelf’ solutions will not always work for every enterprise or property. Requiring the same level of rigour in developing, monitoring and auditing mitigation actions is paramount to ensure reductions in the discharge of diffuse discharges occur.</p> <p>In respect of proposed new (d), the River Iwi consider all properties and enterprises should be operating using Good Management Practice (GMP) or be at Best Management Practice (BMP). It is important to note that GMP/BMP may not, in all cases, be the ‘silver bullet’ solution to address water quality problems and achieve Te Ture Whaimana in 80-years (by 2096).</p>
Policy 2 – Tailored approach for farming systems	PC1-3148	Riverheads Ltd	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-5964	Rotor Work Limited	Oppose	<p>PC1 does not make any decisions on allocation and is premised on avoiding a grand parented approach by NOT articulating rights to discharge contaminants in discharge permits for longer than 10-years.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p> <p>For the purpose of clarity River Iwi do not support a pure grand parented approach to allocating rights to discharge</p>
Policy 2 – Tailored approach for farming systems	PC1-2249	Ryan Farms Ltd	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case,</p>

Table 1

				<p>the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-1674	Samuel, Criton Karaitiana	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-5645	Save Lake Karapiro Inc	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-1127	Shabor Ltd	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-6787	Sinclair Family Trust	Support in Part	<p>The deletion of the words “that will reduce” from (a) is opposed by the River Iwi. The use of the language “take a tailored, risk based approach to” in the absence of “require reductions” does not send the right policy signals that diffuse sources of contaminant discharges from farming systems need to be reduced over time.</p> <p>The amendments to (d) to remove the words “amount” and replace with “risk” is starting to duplicate (a) where a “risk based approach” is taken in tailoring farm environment plans and is not supported by River Iwi.</p> <p>The addition of the words “leaving a property from overland flow of leaching below the root zone” may be a useful addition to make it clear how contaminants are diffusely discharged and could be supported by River Iwi.</p>

Table 1

				While the introduction of collective and sub-catchment groups to achieve demonstrable water quality improvements at scale is supported, the addition of new (e) is opposed by River Iwi. PC1 establishes a pathway for properties and enterprises that are not low intensity activities to either develop Farm Environment Plans or be part of a Certified Industry Scheme. New (e) changes this pathway and infers a new sub-catchment plan structure which is undefined and unlimited in scope. The River Iwi consider there is a risk that new structures will create loopholes for properties and enterprises to avoid reducing the discharge of contaminants to assist with achieving Objective 3 and, ultimately Te Ture Whaimana.
Policy 2 – Tailored approach for farming systems	PC1-11099	Southern Pastures Limited Partnership	Oppose	<p>The River Iwi oppose the amendment to dilute the intent of (d) by adding the words “which is capable of being achieved in the short-term taking into account the particular characteristics of each sub-catchment”. All properties and enterprises need to reduce the diffuse discharge of contaminants to make proportionate and demonstrable water quality improvements in sub-catchments.</p> <p>New policy (da) is opposed by River Iwi at this time. PC1 provides flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants, including the use of internal offset mitigations, that can be recorded in farm environment plans. The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p>
Policy 2 – Tailored approach for farming systems	PC1-5084	Stark, Steven and Theresa	Oppose	The River Iwi consider PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (eg, edge of field mitigations etc). In terms of mechanisms, joint solutions such as catchment collectives/committees and community action groups that achieve the same outcomes as intended by Objective 3 of PC1 are supported by the River Iwi.
Policy 2 – Tailored approach for farming systems	PC1-4057	Stokes Shorthorn Farm Ltd	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-5564	Strang and Strang Limited	Oppose	The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.

Table 1

				In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.
Policy 2 – Tailored approach for farming systems	PC1-7040	Sutherland Produce Ltd	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-9352	Taupo Lake Care Incorporated	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-4412	Te Mata Group Ltd	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-6928	Te Miro Farms Partnership	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>

Table 1

Policy 2 – Tailored approach for farming systems	PC1-8252	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Oppose	<p>The River Iwi prefer the language “Tailored approach” as it recognises the differences between sub-catchment and “off-the-shelf” solutions will not always work for every enterprise or property.</p> <p>The deletion of (a), (d), new (c) and amended (b) do not improve the policy. The prefacing of the 75th percentile rule in the policies is largely redundant as the framing of PC1 already provides the pathway for dairy properties to determine a nitrogen reference point (NRP), be ranked by WRC to ascertain the 75th percentile and then to make necessary reductions of nitrogen and other contaminants through the “tailored” design of Farm Environment Plans or through a Certified Industry Scheme.</p> <p>In respect of the use of Good Management Practice (GMP), the River Iwi consider all properties and enterprises should be operating using GMP or be at Best Management Practice (BMP). It is important to note that GMP/BMP may not, in all cases, be the ‘silver bullet’ solution to address water quality problems and achieve Te Ture Whaimana in 80-years (by 2096).</p>
Policy 2 – Tailored approach for farming systems	PC1-5668	The Surveying Company Ltd	Support	<p>The River Iwi agree the nitrogen reference point needs to be attached with the property and not the enterprise. It is not logical to have a nitrogen reference point for an enterprise that might use multiple blocks of land that could have vastly different nitrogen losses.</p>
Policy 2 – Tailored approach for farming systems	PC1-5088	The Worsp Family Trust	Oppose	<p>The River Iwi consider PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (eg, edge of field mitigations etc). In terms of mechanisms, joint solutions such as catchment collectives/committees and community action groups that achieve the same outcomes as intended by Objective 3 of PC1 are supported by the River Iwi.</p>
Policy 2 – Tailored approach for farming systems	PC1-6782	Twining, Murray Ian and Robyn Joy	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-2473	Verry, Adrian	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>

Table 1

Policy 2 – Tailored approach for farming systems	PC1-5810	Waiawa Farms	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-9490	Waikato and Waipā Branches of the New Zealand Deer Farmers Association	Oppose	<p>The proposed amendments to 2(e) to notify WRC of stock exclusion by 2026 without undertaking any action on the ground, is opposed by the River Iwi. Tailored approaches to address critical source areas will occur through the development of Farm Environment Plans. Mitigation measures are likely to include stock exclusion from waterways [as set out in Schedule C], or similar actions to achieve the same outcome as stock exclusion. The River Iwi consider the sum-total of mitigation actions that are put in place on properties and enterprises across the Waikato and Waipā River catchment (including stock exclusion where applicable) must be equal to or exceed the Objective 3 by 2026.</p>
Policy 2 – Tailored approach for farming systems	PC1-11273	Wairakei Pastoral Ltd	Support in Part	<p>The deletion (b) is opposed by River Iwi as the language “Taking a tailored approach” reflects the differences between sub-catchment and recognises ‘off-the-shelf’ solutions will not always work for every enterprise or property. Requiring the same level of rigour in developing, monitoring and auditing mitigation actions is paramount to ensure reductions in the discharge of diffuse discharges occur.</p> <p>While the introduction of collective and sub-catchment groups to achieve demonstrable water quality improvements at scale is supported by the River Iwi, the addition of new (c) to create a pathway for sub-catchment resource consenting is opposed. PC1 establishes a pathway for properties and enterprises that are not low intensity activities to either develop Farm Environment Plans or be part of a Certified Industry Scheme. PC1 can be considered to be an adaptive response to a long-term water quality target (being Te Ture Whaimana). New (c) changes this pathway and infers a new sub-catchment plan structure which is undefined and unlimited in scope. The River Iwi consider there is a risk that new structures —that are different than catchment and sub-catchment planning— will create loopholes for properties and enterprises to avoid reducing the discharge of contaminants to assist with achieving Objective 3 and, ultimately Te Ture Whaimana.</p> <p>The addition of (e) repeats the architecture of PC1, to manage and require reductions in the diffuse and point sources of contaminants, to use a tailored approach to reducing those discharges, enable low intensity uses, use a staged approach, restrict land use change, prepare for allocation, prioritise implementation, use other methods such as sub-catchment planning and edge of field mitigation etc. All these policies set out to give effect to the objectives, namely Objective 1 and 3. Therefore it is redundant to draft (e).</p>
Policy 2 – Tailored approach for farming systems	PC1-9490	Wairarapa Moana Incorporation	Support in Part	<p>The River Iwi support the application of Good Management Practice (GMP) and Best Management Practice (BMP) and note that both measures are moving targets (eg, as technology improves then GMP shifts and becomes the new BMP). While the River Iwi agree that all properties and enterprises should be operating using GMP or be at BMP, it is important to note that, GMP/BMP may not, in all cases, be the ‘silver bullet’ solution to address water quality problems and achieve Te Ture Whaimana in 80-years (by 2096).</p>

Table 1

Policy 2 – Tailored approach for farming systems	PC1-2255	Wai Shing Ltd	Oppose	<p>The nitrogen reference point is important in that it provides a time constrained reference point for nitrogen loss from a farming system. If the requirement to establish a reference point is not used, it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p> <p>The introduction of collective groups to manage the reduction of discharges is supported by River Iwi where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p>
Policy 2 – Tailored approach for farming systems	PC1-4203	Woodacre Partnership	Support in Part	<p>The introduction of collective groups to manage the reduction of discharges is supported by River Iwi where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p> <p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>
Policy 2 – Tailored approach for farming systems	PC1-11529	Yule, Don, Lauris and Yvette	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems/Te Kaupapa Here 3: He huarahi ka āta whakahāngaihia hei whakaiti i ngā rukenga roha i ngā pūnaha arumoni hei whakatupu hua whenua				

Table 1

Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-6638	Ata Rangi 2015 Limited Partnership	Oppose	Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support amendments to policy 3 that allow commercial vegetable production systems to avoid making reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identifying mitigation actions through (e).
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-7656	AFFCO New Zealand Limited	Oppose	Policy 3 deals explicitly with diffuse sources of contaminants and the suggested use of the term “best practicable option for farming activities”, assumes those activities should be treated as point source discharges. This is because the application of “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges. The use of best or good management practice in the context of managing reductions of diffuse contaminants from commercial vegetable production is appropriate and should be retained.
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-7656	A S Wilcox & Sons Ltd	Oppose	Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support amendments to policy 3 that allow commercial vegetable production systems to avoid making proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identifying mitigation actions through (e). River Iwi consider commercial vegetable production systems will only be “enabled” when (d) is achieved. PC1 already contains a non-complying activity rule for the change of land use to establish commercial vegetable production systems and a new restricted discretionary activity rule is not required.
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-7656	Auckland/Waikato Fish and Game	Support in Part	Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi consider commercial vegetable production systems will only be “enabled” when (d) is achieved. River Iwi support the proposed amendment to (e) inserting “...as part of a resource consent...”. While River Iwi are comfortable with the proportionate language in (g), the proposed amendments to insert “in accordance with the short-term targets in Table 3.11-1, the sub-catchment reduction targets and timeframes in Table 3.11-2” or similar wording would be supported by the River Iwi.
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-6863	Ballance Agri-Nutrients Limited	Oppose	Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support amendments to policy 3 that allow commercial vegetable production systems to avoid making proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identifying mitigation actions through (e). While River Iwi support the preparation of Farm Environment Plans and the identification of mitigation actions that reduce contaminant discharges, the proposed amendment to rely on best or good management practice is opposed. It is unlikely that best or good management practice will be sufficient to achieve Objective 3 short-term water quality targets across all commercial vegetable production systems.
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-11407	Balle Bros Group	Oppose	Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support amendments to policy 3 that allow commercial vegetable production systems to avoid making proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-

Table 1

				<p>2 (in 10-years)— and identifying mitigation actions through (e). River Iwi consider commercial vegetable production systems will only be “enabled” when (d) is achieved.</p> <p>The proposed amendments to delete (b), (c) and (d) and to dilute the intent of Policy 3 through the insertion of “managing and where required” is opposed by River Iwi. PC1 already contains a non-complying activity rule for the change of land use to establish commercial vegetable production systems and a new restricted discretionary activity rule is not required.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-7691	Charion Investment Trust	Support in Part	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support the deletion of Policy 3. Commercial vegetable production systems must make proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identify mitigation actions through (e) in Farm Environment Plans. It is unclear how diffuse discharges from commercial vegetable production systems would be dealt with if Policy 3 was deleted.</p> <p>River Iwi could support the proposed amendments to (d) to reference the short-term freshwater objectives (2026) and the 10% reduction of nitrogen to be based on the nitrogen reference point for the property.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-10653	Department of Conservation	Support in Part	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi support the use of the language “manage and require reductions” as it implies WRC must actively manage commercial vegetable production systems and in doing so, require the reduction of diffuse discharges of the four contaminants.</p> <p>The River Iwi agree it might be useful to define what “reducing overall contaminant discharges overtime” means, particularly if a commercial vegetable production system does not use the same land parcels (as an enterprise). In respect of nitrogen, each property should have a nitrogen reference point which is attached to the property, as opposed to the enterprise.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-10817	Federated Farmers of New Zealand	Oppose	<p>The River Iwi oppose providing commercial vegetable production systems with an exemption to reduce contaminants if those systems are at best or good management practice. This assumes that best or good management practice would achieve the reduction in contaminant discharges that are required to achieve the short-term water quality targets in Table 3.11-2.</p> <p>The deletion of the words “and require reductions” and “reducing” from (a), the deletion of (b) and (g) and the deletion of “10% decrease” are opposed by River Iwi. The use of the language “manage” in the absence of “require reductions” does not send the right policy signals that contaminant discharges from commercial vegetable production systems need to be reduced over time.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-9731	Fertiliser Association of New Zealand	Support in Part	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi support the use of the language “manage and require reductions” as it implies WRC must actively manage commercial vegetable production systems and in doing so, require the reduction of diffuse discharges of the four contaminants. Part of the manage and make reductions implies that over-allocation (that does exist in respect of the</p>

Table 1

				<p>short-term freshwater objective and link to water quality targets in Table 3.11-2), will be addressed to give effect to NPS-FM 2017.</p> <p>The amendments proposed to (d) include “for each sub-catchment” may not be required as policy 3 only refers to commercial vegetable production systems and, it is clear that a 10% reduction in nitrogen and reductions in phosphorus, sediment and microbial pathogens is required across the entire sector.</p> <p>The amendments to (g) to require farm environment plans to identify risks and put in place mitigation actions are similar to (e) and would not add anything of substance to Policy 3.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-5902	Fletcher Trust	Support in Part	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi support amendments proposed to clarify (b) by constraining the total (maximum) area in production for that property or enterprise in any single year that is based on the previous 10-years data up to 2016.</p> <p>The amendments proposed to (d) to specify the 10% reduction of nitrogen must occur by 2026 and referenced to the relative nitrogen reference point is broadly supported by the River Iwi. However, the River Iwi note the lag time from when nitrogen is discharged through the root zone to when it enters water may preclude the policy from being achieved and it might be more prudent to adopt an approach that ensures the mitigation measures required to reduce 10% of nitrogen are put in place by 2026.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-10619	Fonterra Co-operative Group Ltd	Support in Part	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi support amendments proposed to clarify (b) by constraining the total (maximum) area in production for that property or enterprise in any single year that is based on the previous 10-years data up to 2016.</p> <p>The amendments proposed to (d) to specify the 10% reduction of nitrogen must occur by 2026 and referenced to the relative nitrogen reference point is broadly supported by the River Iwi. However, the River Iwi note the lag time from when nitrogen is discharged through the root zone to when it enters water may preclude the policy from being achieved and it might be more prudent to adopt an approach that ensures the mitigation measures required to reduce 10% of nitrogen are put in place by 2026.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-5604	Hancock Forest Management (NZ) Ltd	Oppose	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support the deletion of Policy 3. Commercial vegetable production systems must make proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identify mitigation actions through (e) in Farm Environment Plans. It is unclear how diffuse discharges from commercial vegetable production systems would be dealt with if Policy 3 was deleted.</p> <p>Policy 3 deals explicitly with diffuse sources of contaminants and the suggested use of the term “best practicable option for farming activities”, assumes those activities should be treated as point source discharges. This is because the application of “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-3300	Hill Country Farmers Group	Oppose	<p>The proposed deletion of the nitrogen reference point from (c) is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a farming system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— to achieve the 10% reduction target would be effective. If this was the case,</p>

Table 1

				<p>the good work undertaken by individuals and collectives of farmers could not be accurately accounted for within each sub-catchment.</p> <p>In respect of the use of OVERSEER, in the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors and being available now, the River Iwi oppose the relief sought.</p> <p>The proposed use of stocking rate (and the method to determine stock units in PC1) requires amendment for consistency and workability. It is unclear if stock unit is a “wintered stock unit” or an “annual average stock unit”. The River Iwi consider a definition of stock unit is required in the Glossary that is consistent with what is used in the farming industry. Objectives, Policies, Methods and Schedules contained in PC1 that refer to “stock unit” will need to be consequentially amended to be consistent with the new definition.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-1342	Horticulture New Zealand (HortNZ)	Oppose	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support amendments to policy 3 that allow commercial vegetable production systems to avoid making proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identifying mitigation actions through (e).</p> <p>The River Iwi oppose the removal of the 10% target for nitrogen reduction and replacement of a lower figure of 5%. Granting the relief sought would provide for commercial vegetable production systems to reduce less nitrogen, which does not send an appropriate policy signal to the rest of the regional community.</p> <p>The additions of the four bullets to (d) are also opposed by River Iwi, as the principle rationale for PC1 is to achieve Te Ture Whaimana in 80-years and the additions provide counter rationale that suggest commercial vegetable production systems should be provided for —irrespective of their discharge footprint— due to the loss of land elsewhere and the need to supply vegetables to market.</p> <p>The introduction of collective groups in (e) to manage the reduction of discharges is supported where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p> <p>The River Iwi oppose new (h) as granting resource consents for long-term duration simply locks in perceived rights to discharge contaminants ,and avoids sectors needing to make necessary reductions of contaminants to assist with achieving Te Ture Whaimana. Such an outcome —long-term duration resource consents that lock in perceived rights to discharge— is unacceptable to River Iwi as the Waikato and Waipa Rivers will continue bear the cost of inaction.</p> <p>PC1 provides flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants, including the use of internal offset mitigations, that can be recorded in farm environment plans. The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>The proposed deletion of (c) to establish a nitrogen reference point is opposed by River Iwi. If the requirement to establish a reference point for the loss of nitrogen from a commercial vegetable production system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice)</p>

Table 1

				through farm environment plans and/or certified industry schemes (GLOBALG.A.P)— to achieve the 10% reduction target would be effective. If this was the case, the good work undertaken by individual and collectives of growers could not be accurately accounted for “across the sector” and/or within each sub-catchment. In the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors being available now, the River Iwi oppose the relief sought.
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-1342	Jivan Produce Ltd	Oppose	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support amendments to policy 3 that allow commercial vegetable production systems to avoid making proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identifying mitigation actions through (e).</p> <p>The proposed amendments to delete (c) to establish a nitrogen reference point. If the requirement to establish a reference point for the loss of nitrogen from a production system is not used it would be impossible to quantify whether mitigation measures —that were put in place (such as best or good management practice) through farm environment plans and/or certified industry schemes— were effective. In this way the good work undertaken by individual and collectives of growers could not be accurately accounted for. In the absence of a like/similar model that is equally or more robust, cost effective, durable and workable across sectors being available now, the River Iwi oppose the relief sought.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-6400	Oji Fibre Solutions (NZ) Limited	Oppose	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support the deletion of Policy 3. Commercial vegetable production systems must make proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identify mitigation actions through (e) in Farm Environment Plans. It is unclear how diffuse discharges from commercial vegetable production systems would be dealt with if Policy 3 was deleted.</p> <p>Policy 3 deals explicitly with diffuse sources of contaminants and the suggested use of the term “best practicable option for farming activities”, assumes those activities should be treated as point source discharges. This is because the application of “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-11145	Primary Land Users Group	Oppose	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support amendments to policy 3 that allow commercial vegetable production systems to avoid making proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identifying mitigation actions through (e). River Iwi consider commercial vegetable production systems will only be “enabled” when (d) is achieved.</p> <p>The proposed amendments to delete (b), (c) and (d) and to dilute the intent of Policy 3 through the insertion of “managing and where required” is opposed by River Iwi. PC1 already contains a non-complying activity rule for the change of land use to establish commercial vegetable production systems and a new restricted discretionary activity rule is not required.</p>
Policy 3 – Reducing diffuse discharges	PC1-2251	Ryan Farms Ltd	Oppose	Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support amendments to policy 3 that allow commercial vegetable production systems to avoid making

Table 1

from commercial vegetables				<p>proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identifying mitigation actions through (e).</p> <p>The proposed amendments to delete (b) is opposed by River Iwi given the nature of the commercial vegetable production systems and the rotational nature of how these systems work. Amendments to refine and strengthen (b) are supported by the River Iwi to ensure the outcome of reducing diffuse contaminant discharges is achieved.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-5092	Stark, Steven and Theresa	Oppose	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support the deletion of Policy 3. Commercial vegetable production systems must make proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identify mitigation actions through (e) in Farm Environment Plans.</p> <p>It is unclear how diffuse discharges from commercial vegetable production systems would be dealt with if Policy 3 was deleted.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-8207	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Support in Part	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support amendments to policy 3 that allow commercial vegetable production systems to avoid making proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identifying mitigation actions through (e).</p> <p>PC1 does not require a permitted activity rule for commercial vegetable production systems as they are not classified as a low intensity land use. The River Iwi believe that if a commercial vegetable production system achieve compliance with PC1 (eg, it is part of a Certified Industry Scheme and/or has a farm environment plan and resource consent identifying mitigation actions), then the land use should be able to operate until 2026.</p> <p>While River Iwi consider commercial vegetable production systems will only be “enabled” when (d) is achieved, the deletion of (f) would not be opposed.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-5674	The Surveying Company Ltd	Oppose	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support the deletion of Policy 3. Commercial vegetable production systems must make proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identify mitigation actions through (e) in Farm Environment Plans.</p> <p>It is unclear how diffuse discharges from commercial vegetable production systems would be dealt with if Policy 3 was deleted.</p>
Policy 3 – Reducing diffuse discharges from commercial vegetables	PC1-5775	Treweek, Glen	Oppose	<p>Policy 3 requires the reduction of diffuse discharges of contaminants from commercial vegetable production systems. The River Iwi do not support the deletion of Policy 3. Commercial vegetable production systems must make proportionate reductions of contaminants through (d) —and in accordance with Table 3.11-1 (in 80-years) and Table 3.11-2 (in 10-years)— and identify mitigation actions through (e) in Farm Environment Plans.</p> <p>It is unclear how diffuse discharges from commercial vegetable production systems would be dealt with if Policy 3 was deleted.</p>
Policy 3 – Reducing diffuse discharges	PC1-3347	Tuakau Proteins Limited	Oppose	<p>Policy 3 deals explicitly with diffuse sources of contaminants and the suggested use of the term “best practicable option for farming activities”, assumes those activities should be treated as point source discharges. This is because the</p>

Table 1

from commercial vegetables				<p>application of “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges.</p> <p>The use of best or good management practice in the context of managing reductions of diffuse contaminants from commercial vegetable production is appropriate and should be retained.</p>
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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future/Te Kaupapa Here 4: Te tuku kia haere tonu, kia whakatūria rānei ngā tūmahi he iti iho ngā rukenga, me te tohu ake ākuanei pea me panoni anō hei ngā tau e heke mai ana				
Policy 4 – Enable low discharges to continue + signal further changes	PC1-6638	Ata Rangi 2015 Limited Partnership	Support in Part	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes.</p> <p>The River Iwi agree the definition of “low discharging” requires definition to be consistent with “low intensity farming activities” that are defined by conditions (1-7) of rule 3.11.5.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-10878	Auckland/Waikato Fish and Game	Support in Part	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes.</p> <p>The River Iwi consider the addition of the term “significant adverse effects are avoided” may not add value to Policy 4 as PC1 must be subservient to Part II of the RMA.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-11408	Balle Bros Group	Oppose	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-11488	Beef + Lamb New Zealand Limited	Support in Part	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes.</p>

Table 1

				The River Iwi agree the definition of “low discharging” requires definition to be consistent with “low intensity farming activities” that are defined by conditions (1-7) of rule 3.11.5.
Policy 4 – Enable low discharges to continue + signal further changes	PC1-1402	Buckley, Peter Ross	Oppose	Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi. The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.
Policy 4 – Enable low discharges to continue + signal further changes	PC1-6326	Cameron, Bruce	Oppose	Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi. The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.
Policy 4 – Enable low discharges to continue + signal further changes	PC1-7722	Charion Investment Trust	Support in Part	Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi. The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. The River Iwi agree the definition of “low discharging” requires definition to be consistent with “low intensity farming activities” that are defined by conditions (1-7) of rule 3.11.5. However, the re-framing of Policy 4 is opposed by River Iwi.
Policy 4 – Enable low discharges to continue + signal further changes	PC1-7382	Contact Energy Limited	Support in Part	Policy 4 applies to low discharging diffuse discharges and not point source discharges. Policies 10, 11, 12 and 13 deal explicitly with point source discharges of the four contaminants and the River Iwi consider there is no benefit from the amendments proposed to remove the words “diffuse source”.
Policy 4 – Enable low discharges to continue + signal further changes	PC1-10655	Department of Conservation	Support in Part	Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi. The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. The River Iwi consider there may be some merit in the defining “low discharging activities” . However any new definition must be consistent with “low intensity farming activities” that are framed by conditions (1-7) of rule 3.11.5.1.
Policy 4 – Enable low discharges to	PC1-10423	Farmers 4 Positive Change (F4PC)	Oppose	Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.

Table 1

continue + signal further changes				The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.
Policy 4 – Enable low discharges to continue + signal further changes	PC1-5388	FarmRight	Support in Part	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. The removal of “sediment” from Policy 4 is opposed by River Iwi.</p> <p>The River Iwi agree the definition of “low discharging” requires definition to be consistent with “low intensity farming activities” that are defined by conditions (1-7) of rule 3.11.5. However, the re-framing of Policy 4 is opposed by River Iwi.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-5914	Fletcher Trust	Support in Part	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. The re-framing of Policy 4 as proposed by the submitter is opposed by River Iwi.</p> <p>The River Iwi agree the definition of “low discharging” requires definition to be consistent with “low intensity farming activities” that are defined by conditions (1-7) of rule 3.11.5.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-10471	Fonterra Co-operative Group Ltd	Support in Part	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. The re-framing of Policy 4 as proposed by the submitter is opposed by River Iwi.</p> <p>The River Iwi agree the definition of “low discharging” requires definition to be consistent with “low intensity farming activities” that are defined by conditions (1-7) of rule 3.11.5.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-3240	Genetic Technologies Ltd	Oppose	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.</p>

Table 1

Policy 4 – Enable low discharges to continue + signal further changes	PC1-6419	Gleeson, Graeme B	Oppose	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-10258	Hamilton City Council	Oppose	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>Proposed amendments to include other “high discharging” land uses that are not “low discharging” land uses into Policy 4 circumvents the intent of PC1 to achieve Te Ture Whaimana in 80-years (by 2096), and is opposed by River Iwi.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-7726	Hill Country Farmers Group	Oppose	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-4558	Holmes, Gavin	Oppose	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-5867	Huirimu Farms Ltd	Oppose	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The deletion of Policy 4 is opposed by River Iwi.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-1813	Kilgour, Gareth	Support in Part	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p>

Table 1

				<p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.</p> <p>The River Iwi agree the definition of “low discharging” requires definition to be consistent with “low intensity farming activities” that are defined by conditions (1-7) of rule 3.11.5. However, the re-framing of Policy 4 is opposed by River Iwi.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-3489	Matamata-Piako District Council	Oppose	<p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 and connection to Objective 3 are opposed by River Iwi.</p> <p>The proposed amendments do not provide any clarity as a definition of “discharges of low volumes” would require a definition, similar to the need for a definition of “low discharging”. The re-framing of Policy 4 is opposed by River Iwi.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-6403	Oji Fibre Solutions (NZ) Limited	Support in Part	<p>Policy 4 deals explicitly with diffuse sources of contaminants and the suggested use of the term “best practicable option for farming activities”, assumes those activities should be treated as point source discharges. This is because the application “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of BPO that is capable of managing diffuse discharges. Notwithstanding the argument that “best practicable option” may not equate to Te Ture Whaimana in 80-years (by 2096), the use of the “best practicable option” by land owners on such a scale (and then the assessment required by WRC on a consent by consent basis) may not be feasible. River Iwi oppose this amendment.</p> <p>The addition of the word “diffuse” into the header of Policy 4 is supported by the River Iwi.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-11147	Primary Land Users Group	Oppose	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-10105	Ravensdown Limited	Oppose	<p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. The River Iwi agree the definition of “low discharging” requires definition to be consistent with “low intensity farming activities” that are defined by conditions (1-7) of rule 3.11.5. However, the re-framing of Policy 4 is opposed by River Iwi.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-2252	Ryan Farms Ltd	Oppose	<p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. The River Iwi agree the definition of “low discharging” requires definition to be consistent with “low intensity farming activities” that are defined by conditions (1-7) of rule 3.11.5. However, the re-framing of Policy 4 is opposed by River Iwi.</p>
Policy 4 – Enable low discharges to	PC1-11100	Southern Pastures Limited Partnership	Oppose	<p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. The River Iwi agree the definition of “low</p>

Table 1

continue + signal further changes				discharging” requires definition to be consistent with “low intensity farming activities” that are defined by conditions (1-7) of rule 3.11.5. However, the re-framing of Policy 4 is opposed by River Iwi.
Policy 4 – Enable low discharges to continue + signal further changes	PC1-4040	South Waikato District Council	Oppose	The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 and connection to Objective 3 are opposed by River Iwi. The proposed amendments do not provide any clarity as a definition of “discharges of low volumes” would require a definition, similar to the need for a definition of “low discharging”. The re-framing of Policy 4 is opposed by River Iwi.
Policy 4 – Enable low discharges to continue + signal further changes	PC1-2757	Spectrum Dairies Limited Partnership	Oppose	Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 4 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.
Policy 4 – Enable low discharges to continue + signal further changes	PC1-5103	Stark, Steven and Theresa	Oppose	Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi. The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 and amend the implementation date are opposed by River Iwi
Policy 4 – Enable low discharges to continue + signal further changes	PC1-5776	Treweek, Glen	Oppose	Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi. The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 and amend the implementation date are opposed by River Iwi
Policy 4 – Enable low discharges to continue + signal further changes	PC1-9766	Trinity Lands Ltd	Oppose	Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi. The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 and amend the implementation date are opposed by River Iwi
Policy 4 – Enable low discharges to continue + signal further changes	PC1-6784	Twining, Murray Ian and Robyn Joy	Oppose	Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi. The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.

Table 1

Policy 4 – Enable low discharges to continue + signal further changes	PC1-11344	Wairakei Pastoral Ltd	Oppose	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to “manage” the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>It is unlikely that low discharging land uses would require resource consent and if they did, there are options for participation in Certified Industry Schemes —as a permitted activity— or to develop a Farm Environment Plan —as a controlled activity—. The proposed amendments to Policy 4 are not required.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-4207	Woodacre Partnership	Oppose	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.</p>
Policy 4 – Enable low discharges to continue + signal further changes	PC1-11530	Yule, Don, Lauris and Yvette	Oppose	<p>Policy 4 provides flexibility for “low discharging” land uses to continue, land uses to change over time —where the discharge is low or has been reduced to low—, and for new low discharging land uses to establish. The requirement to manage the cumulative effects of low discharging diffuse discharges is supported by River Iwi.</p> <p>The future-proofing intent of Policy 4 signals that land uses defined as “low discharging” may be required to make reductions in the discharge of contaminants from land use in subsequent plan changes. Amendments to remove the future signals from Policy 4 are opposed by River Iwi.</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 5: Staged approach/Te Kaupapa Here 5: He huarahi wāwāhi				
Policy 5 – Staged approach	PC1-9020	Bailey, James	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p>
Policy 5 – Staged approach	PC1-11489	Beef + Lamb New Zealand Limited	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p>

Table 1

				<p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p> <p>River Iwi support catchment based management and the use of catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p> <p>The River Iwi support changes to strengthen the intent of Policy 5, particularly the requirement to sequence change over time to achieve Te Ture Whaimana.</p>
Policy 5 – Staged approach	PC1-7748	Charion Investment Trust	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p> <p>River Iwi consider existing objectives, policies and methods in PC1 address the first 10 years (to 2026) and amendments proposed to introduce linkages to Objective 3 and Table 3.11-2 are redundant.</p>
Policy 5 – Staged approach	PC1-10780	CNI Iwi Land Management Limited	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>The River Iwi consider there is little point in expending valuable resources now to attempt map a more clear path to achieve long-term (80-year) water quality targets (Te Ture Whaimana) as more robust information and data —obtained through the operationalisation of PC1— is required to inform this work.</p>
Policy 5 – Staged approach	PC1-9787	Fertiliser Association of New Zealand	Support in Part	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana.</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants. The science information determines that further reductions in the discharge of the four contaminants ‘will be required’ to achieve Te Ture Whaimana. The River Iwi accept that in future (post 2026) plan changes the term ‘may require’ will be more appropriate in some sub-catchments.</p>
Policy 5 – Staged approach	PC1-5934	Fletcher Trust	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years</p>

Table 1

				<p>and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p> <p>River Iwi consider existing objectives, policies and methods in PC1 address the first 10 years (to 2026) and amendments proposed to introduce linkages to Objective 3 and Table 3.11-2 are redundant.</p>
Policy 5 – Staged approach	PC1-10472	Fonterra Co-operative Group Ltd	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p> <p>River Iwi consider existing objectives, policies and methods in PC1 address the first 10 years (to 2026) and amendments proposed to introduce linkages to Objective 3 and Table 3.11-2 are redundant.</p>
Policy 5 – Staged approach	PC1-10866	Fulton Hogan Limited	Oppose	<p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported.</p> <p>However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits.</p>
Policy 5 – Staged approach	PC1-3607	GBC Winstone	Oppose	<p>The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. Changes to “short term <u>freshwater</u> objectives” to be consistent with the language of the NPS-FM are supported.</p> <p>However, the ‘short-term’ language used in the NPS-FM should not preclude (or encumber) the use of the terms such as “long term freshwater objectives”, particularly when the 80-year timeframe to achieve Te Ture Whaimana far exceeds the operational life of the NPS-FM.</p> <p>The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the short-term (by 2026) freshwater objective. If the targets are achieved before 2026, then the numerical attributes states in table 3.11-2 become the limits.</p>

Table 1

Policy 5 – Staged approach	PC1-6431	Gleeson, Graeme B	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p>
Policy 5 – Staged approach	PC1-10056	Horticulture New Zealand (HortNZ)	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>The River Iwi oppose the insertion of additional text that prescribes the precise design of permits for non-point source (diffuse) discharges that convey rights to discharge any, or all, of the four contaminants from land use. Resource consents issued on the back of Farm Environment Plans must be hybrid land use resource consents that focus on the implementation (putting in place) mitigation measures that are target towards, and designed to, reduce the discharge of the four contaminants from the use of land. Any such hybrid land use consents must be for a duration 10-years, or must coincide with the 2026 expiry date for PC1 (or agreed date shortly after 2026 to coincide with the next stage of the Healthy Rivers Wai Ora project).</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives. In this sense, Objective 4 is part of a contextual balance with other PC1 objectives and does not require amendments as proposed.</p>
Policy 5 – Staged approach	PC1-6982	Jodean Farms	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>The River Iwi consider there is little point in expending valuable resources now to attempt map a more clear path to achieve long-term (80-year) water quality targets (Te Ture Whaimana) as more robust information and data —obtained through the operationalisation of PC1— is required to inform this work.</p>
Policy 5 – Staged approach	PC1-1818	Kilgour, Gareth	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p>
Policy 5 – Staged approach	PC1-6999	Matahuru Farms Ltd	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years</p>

Table 1

				<p>and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p> <p>River Iwi support catchment based management/planning and the use of catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p> <p>The River Iwi support changes to strengthen the intent of Policy 5, particularly the requirement to sequence change over time to achieve Te Ture Whaimana.</p>
Policy 5 – Staged approach	PC1-3491	Matamata-Piako District Council	Support in Part	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p> <p>River Iwi support catchment based management/planning and the use of catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures. While the refinement of spatial scale of management to the sub-catchment level is supported by River Iwi in the long-term, the ability of WRC to manage at this scale now for the purpose of implementing PC1 and in the absence of high quality and robust data and information at the sub-catchment scale, is questionable.</p> <p>The River Iwi support changes to strengthen the intent of Policy 5, particularly the requirement to sequence change over time to achieve Te Ture Whaimana.</p>
Policy 5 – Staged approach	PC1-9294	Matira Sub Catchment Group	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p>
Policy 5 – Staged approach	PC1-9537	Mercury NZ Limited	Support in Part	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p>

Table 1

				<p>Achieving Te Ture Whaimana is predicated on the long-term water quality targets set out in Table 3.11-1. Policy 5 gives effect to Objective 1 and therefore it is implicit that what is being staged and sequenced toward (in respect of water quality) is Table 3.11-1. However, if this is not the case, River Iwi support making this linkage more clear in Policy 5.</p> <p>The River Iwi support changes to strengthen the intent of Policy 5, particularly the requirement to sequence change over time to achieve Te Ture Whaimana.</p>
Policy 5 – Staged approach	PC1-8819	Miraka Limited	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p> <p>The River Iwi support changes to strengthen the intent of Policy 5, particularly the requirement to sequence change over time to achieve Te Ture Whaimana.</p>
Policy 5 – Staged approach	PC1-6403	Oji Fibre Solutions (NZ) Limited	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The application of “best practicable option” implies there is discretion for an applicant and consenting authority to determine whether the use of offsets is the best practicable option to reduce the four contaminants from point source discharges. The amendment to constrain the interpretation of “best practicable option” to just the use of offset mechanisms is not supported by the River Iwi, as the full range of on-site mitigations should be exhausted first.</p> <p>The River Iwi note the use of offsets can only occur when the accounting framework is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment.</p>
Policy 5 – Staged approach	PC1-6289	Pouakani Trust	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p> <p>The River Iwi support changes to strengthen the intent of Policy 5, particularly the requirement to sequence change over time to achieve Te Ture Whaimana.</p>

Table 1

Policy 5 – Staged approach	PC1-5642	Save Lake Karapiro Inc	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p> <p>The River Iwi support changes to strengthen the intent of Policy 5, particularly the requirement to sequence change over time to achieve Te Ture Whaimana.</p>
Policy 5 – Staged approach	PC1-4041	South Waikato District Council	Support in Part	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p> <p>River Iwi support catchment based management/planning and the use of catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures. While the refinement of spatial scale of management to the sub-catchment level is supported by River Iwi in the long-term, the ability of WRC to manage at this scale now for the purpose of implementing PC1 and in the absence of high quality and robust data and information at the sub-catchment scale, is questionable.</p> <p>The River Iwi support changes to strengthen the intent of Policy 5, particularly the requirement to sequence change over time to achieve Te Ture Whaimana.</p>
Policy 5 – Staged approach	PC1-2760	Spectrum Dairies Limited Partnership	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p> <p>The River Iwi support changes to strengthen the intent of Policy 5, particularly the requirement to sequence change over time to achieve Te Ture Whaimana.</p>

Table 1

Policy 5 – Staged approach	PC1-5101	Stark, Steven and Theresa	Oppose	Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.
Policy 5 – Staged approach	PC1-8257	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p> <p>The River Iwi support changes to strengthen the intent of Policy 5, particularly the requirement to sequence change over time to achieve Te Ture Whaimana.</p>
Policy 5 – Staged approach	PC1-5078	The Worsp Family Trust	Oppose	Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.
Policy 5 – Staged approach	PC1-6235	Waikato Environment Centre	Oppose	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans). Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc and would include offsets for diffuse discharges, will be worked through with the benefit of improved data and information from the implementation of PC1.</p>
Policy 5 – Staged approach	PC1-2106	Wairarapa Moana Incorporation	Support in Part	<p>Policy 5 is future focused and forecasts the need for a staged and sequenced approach to achieving Te Ture Whaimana. The staged approach is a logical response to sequencing change over time, particularly as Objective 1 will be achieved in 80-years and it is important to signal that future changes will be required (eg, future plan changes) to achieve Te Ture Whaimana. In this respect Policy 5 MUST BE RETAINED and/or strengthened.</p> <p>Objective 2 sets out the long term maintenance of social, economic and cultural wellbeing. Objective 4 provides for short-term social, economic and cultural wellbeing on a transitional basis and signals adaption is required to achieve the short-term freshwater objectives in 10-years (by 2026) and Te Ture Whaimana in 80-years (by 2096). In this sense, Policy 5 is part of a contextual balance between wellbeing and time and does not require amendments as proposed.</p>

Table 1

				The River Iwi support changes to strengthen the intent of Policy 5, particularly the requirement to sequence change over time to achieve Te Ture Whaimana.
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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 6: Restricting land use change/Te Kaupapa Here 6: Te here i te panonitanga ā-whakamahinga whenua				
Policy 6 – Restricting land use change	PC1-9529	Advisory Committee on Regional Environment (ACRE)	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information, or exceptions for land uses to change and increase the discharge of the four contaminants.</p> <p>The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-4313	A S Wilcox & Sons Ltd	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information, or exceptions for land uses to change and increase the discharge of the four contaminants.</p> <p>The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-6133	Ata Rangi 2015 Limited Partnership	Oppose	<p>The new policy [X1] will effectively undo all the hard work undertaken by other properties and enterprises in sub-catchments to reduce the discharge of contaminants and assist to achieve 10% of the journey to Te Ture Whaimana (Objective 3) by 2026.</p> <p>.A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p>

Table 1

Policy 6 – Restricting land use change	PC1-10879	Auckland/Waikato Fish and Game	Support	The River Iwi support amendments to clarify Policy 6 to ensure that any reductions in contaminants can be identified and are sustained in the long-term. This means reductions are not short-term fluctuations caused by natural variability and are actual reductions due to mitigation measures being put in place on farms.
Policy 6 – Restricting land use change	PC1-6864	Ballance Agri-Nutrients Limited	Support in Part	A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc). In respect of Table 3.11-2 sub-catchments are over-allocated for concentrations of contaminants, however it is difficult to determine property-scale loads of contaminants and form a judgement as to whether the over-allocation has been addressed.
Policy 6 – Restricting land use change	PC1-11410	Balle Bros Group	Oppose	The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc). The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-9068	B Das and Sons Ltd	Oppose	The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc). The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-11490	Beef + Lamb New Zealand Limited	Oppose	The River Iwi consider Policy 6 sets up a managed pathway for land use change that “holds the line” for 10-years (to 2026). The policy was never intended to be an open ended look at intensification within a sector and is, instead, a blunt way of preventing unchecked and unmanaged land use change. The River Iwi oppose the amendments (a) and (b) in Policy 6 as this infers that an application need to only demonstrate no increase in contaminants, whereas PC1 establishes a framework to reduce the diffuse discharge of contaminants. The amendments have the same outcome as locking in a set discharge of contaminants which is inconsistent with the intent of PC1 to achieve 10% of the journey to Te Ture Whaimana by 2026.
Policy 6 – Restricting land use change	PC1-6475	Bolt Trust, King Country Partnership 2013 LP and Lone Pine Trust	Oppose	The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information. The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).

Table 1

				The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-1408	Buckley, Peter Ross	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information.</p> <p>The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-6337	Cameron, Bruce	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information.</p> <p>The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-7747	Charion Investment Trust	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-5561	Chhagn Bros Co Ltd	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information.</p> <p>The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change</p>

Table 1

				decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-10781	CNI Iwi Land Management Limited	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-9728	Craig, Jeffery	Oppose	<p>The River Iwi note subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p> <p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p>
Policy 6 – Restricting land use change	PC1-10230	DairyNZ	Oppose	<p>The River Iwi consider Policy 6 sets up a managed pathway for land use change that “holds the line” for 10-years (to 2026). The policy was never intended to be an open ended look at intensification within a sector and is, instead, a blunt way of preventing unchecked and unmanaged land use change.</p> <p>The River Iwi oppose the amendments (a) and (b) in Policy 6 as this infers that an application need to only demonstrate no increase in contaminants, whereas PC1 establishes a framework to reduce the diffuse discharge of contaminants. The amendments have the same outcome as locking in a set discharge of contaminants which is inconsistent with the intent of PC1 to achieve 10% of the journey to Te Ture Whaimana by 2026.</p>
Policy 6 – Restricting land use change	PC1-619	Dunlop, Tania	Oppose	<p>The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Of particular importance to the Waikato and Waipā River Iwi is: (i) exercising mana whakahaere over lands and resources; (ii) sustaining the relationship between ancestral lands and the Waikato and Waipā Rivers (including their tributaries); (iii) retaining an appropriate level of flexibility to utilise land returned through Treaty of Waitangi settlements and Maori freehold land; and (iv) more generally, improving water quality of the awa.</p> <p>Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. It is appropriate that further restrictions that prevent Treaty Settlement land and Maori freehold land from being developed should be minimised.</p>

Table 1

Policy 6 – Restricting land use change	PC1-1162	Eight Mile Farms Ltd	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-10822	Federated Farmers of New Zealand	Oppose	<p>The River Iwi consider Policy 6 sets up a managed pathway for land use change that “holds the line” for 10-years (to 2026). The policy was never intended to be an open ended look at intensification within a sector and is, instead, a blunt way of preventing unchecked and unmanaged land use change.</p> <p>The River Iwi oppose the amendments to reference Policy 1 and 2 in Policy 6 as this would create a circular reference where all properties and enterprises [that demonstrate an increase in the diffuse discharge of contaminants] applying for land use change resource consents through Rule 3.11.5.7 would not be subject to the “generally not be granted” conditioning. River Iwi consider this is a considerable risk that land use change will occur unchecked.</p>
Policy 6 – Restricting land use change	PC1-5941	Fletcher Trust	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-10473	Fonterra Co-operative Group Ltd	Oppose	<p>The River Iwi consider Policy 6 sets up a managed pathway for land use change that “holds the line” for 10-years (to 2026). The policy was never intended to be an open ended look at intensification within a sector and is, instead, a blunt way of preventing unchecked and unmanaged land use change.</p> <p>The River Iwi oppose the amendments (a) and (b) in Policy 6 as this infers that an application need to only demonstrate no increase in contaminants, whereas PC1 establishes a framework to reduce the diffuse discharge of contaminants. The amendments have the same outcome as locking in a set discharge of contaminants which is inconsistent with the intent of PC1 to achieve 10% of the journey to Te Ture Whaimana by 2026.</p>
Policy 6 – Restricting land use change	PC1-6451	Gleeson, Graeme B	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>

Table 1

Policy 6 – Restricting land use change	PC1-4364	Goodwright, Sydney Alfred	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information.</p> <p>The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-3817	Guy, Denise and John	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-10262	Hamilton City Council	Oppose	<p>The River Iwi oppose new policy 5a as the Regional Plan and Regional Policy Statement already provides for urban growth within the Waikato Region and there is no justification for a new and duplicate policy in PC1. Collectively, urban land uses need to demonstrate they are making a contribution to the reduction in the discharge of the four contaminants and assisting to achieve Te Ture Whaimana in 80-years (by 2096).</p> <p>River Iwi also oppose the addition of policy 5a into Policy 6.</p>
Policy 6 – Restricting land use change	PC1-5633	Hancock Forest Management (NZ) Ltd	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-7731	Hill Country Farmers Group	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>

Table 1

Policy 6 – Restricting land use change	PC1-4125	Hira Bhana and Co Ltd	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information.</p> <p>The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-4561	Holmes, Gavin	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information.</p> <p>The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-6038	Horticulture New Zealand (HortNZ)	Oppose	<p>The River Iwi consider Policy 6 sets up a managed pathway for land use change that “holds the line” for 10-years (to 2026). The policy was never intended to be an open ended look at intensification within a sector and is, instead, a blunt way of preventing unchecked and unmanaged land use change.</p> <p>The River Iwi oppose the proposed amendments as they arguably loosen policy 6 by removing the term “land use change” which suggests applications may not be for land use change as was intended by PC1. The addition of “on the balance” sets up a situation where an application does not have to demonstrate “clear and enduring decreases” which is the rationale for why an application would “generally be granted”.</p>
Policy 6 – Restricting land use change	PC1-6822	Jefferis, Daniel	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information.</p> <p>The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>

Table 1

Policy 6 – Restricting land use change	PC1-1348	Jivan Produce Ltd	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-6986	Jodean Farms	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-10025	Kaihere Farms Ltd	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-1827	Kilgour, Gareth	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-5280	Living Foods Ltd	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>

Table 1

Policy 6 – Restricting land use change	PC1-678	MacLachlan, Ian Gibson and Lindsay Phillip	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-9309	Matira Sub Catchment Group	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-6859	Muir, Mark	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information.</p> <p>The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-8762	Nelson Farms Partnership	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information.</p> <p>The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-9957	New Zealand Forest Owners Association Inc	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p>

Table 1

				The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-6404	Oji Fibre Solutions (NZ) Limited	Oppose	The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc). The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-2728	Onewhero Tuakau Community Board	Oppose	The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information. The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc). The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-4190	Perfect Produce Co Ltd	Oppose	The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information. The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc). The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-11152	Primary Land Users Group	Oppose	The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc). The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.

Table 1

Policy 6 – Restricting land use change	PC1-4799	Pukerimu Farms Limited	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-6946	R.P O'Connor and Sons Ltd	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-3151	Riverheads Ltd	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-2504	Rotorua Lakes Council	Oppose	<p>The River Iwi consider Policy 6 sets up a managed pathway for land use change that “holds the line” for 10-years (to 2026). The policy was never intended to be an open ended look at intensification within a sector or allowing for urban growth and development and the relationship to point source discharges. The River Iwi oppose the reference of Policy 10, 11, and 12 to Policy 6.</p>
Policy 6 – Restricting land use change	PC1-2259	Ryan Farms Ltd	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-1108	Shabor Ltd	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p>

Table 1

				The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-11102	Southern Pastures Limited Partnership	Oppose	The new policy [X1] will effectively undo all the hard work undertaken by other properties and enterprises in sub-catchments to reduce the discharge of contaminants and assist to achieve 10% of the journey to Te Ture Whaimana (Objective 3) by 2026. .A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).
Policy 6 – Restricting land use change	PC1-5110	Stark, Steven and Theresa	Oppose	The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc). The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-5566	Strang and Strang Limited	Oppose	The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc). The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-7049	Sutherland Produce Ltd	Oppose	The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information. The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc). The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-6515	Taniwha Estate Ltd	Oppose	The proposed amendments to Policy 6 are repetitive and do not provide any further clarity or direction to assist decision-makers or plan users. Applications for land use change need to demonstrate sustained and long-term reductions in the

Table 1

				discharge of contaminants as of the notification of the plan and, must assist to achieve the short-term water quality targets for each sub-catchment as set out in Table 3.11-2.
Policy 6 – Restricting land use change	PC1-7472	Tapp, Kevin	Oppose	<p>The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Of particular importance to the Waikato and Waipā River Iwi is: (i) exercising mana whakahaere over lands and resources; (ii) sustaining the relationship between ancestral lands and the Waikato and Waipā Rivers (including their tributaries); (iii) retaining an appropriate level of flexibility to utilise land returned through Treaty of Waitangi settlements and Maori freehold land; and (iv) more generally, improving water quality of the awa.</p> <p>Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. It is appropriate that further restrictions that prevent Treaty Settlement land and Maori freehold land from being developed should be minimised.</p>
Policy 6 – Restricting land use change	PC1-4418	Te Mata Group Ltd	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-6902	Te Miro Farms Partnership	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-5086	The Worsp Family Trust	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-3318	Timberlands Limited	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change</p>

Table 1

				decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.
Policy 6 – Restricting land use change	PC1-8441	TIM Nominees	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-9767	Trinity Lands Ltd	Oppose	<p>The River Iwi oppose the deletion of Policy 6. A restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-6786	Twining, Murray Ian and Robyn Joy	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information.</p> <p>The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-3797	Verry, Reon and Wendy	Oppose	<p>The River Iwi note subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p> <p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p>

Table 1

Policy 6 – Restricting land use change	PC1-6725	Waikato Regional Council	Support in Part	The River Iwi support in part the addition of “compared with what was occurring at 22 October 2016”. While a benchmark date is important for the context of when measurement is taken, the term “occurring” is ambiguous and should be amended to “being discharged”. The River Iwi consider that reduction in the diffuse discharge of contaminants, in the context of land use change, should also be referenced to the sub-catchment water quality targets in Table 3.11-2.
Policy 6 – Restricting land use change	PC1-8351	Waipā District Council	Oppose	The River Iwi consider Policy 6 sets up a managed pathway for land use change that “holds the line” for 10-years (to 2026). The policy was never intended to be an open ended look at intensification within a sector or allowing for urban growth and development and the relationship to point source discharges. The River Iwi oppose the reference of Policy 10, 11, and 12 to Policy 6.
Policy 6 – Restricting land use change	PC1-11346	Wairakei Pastoral Ltd	Oppose	<p>The River Iwi support sub-catchment planning and the use of catchment collectives -using catchment based planning— as one mechanism to achieve improved water quality outcomes at a greater scale than singular farm environment plans. Sub-catchment based management and catchment collectives need to demonstrate that water quality improvements will occur through the effective and efficient use of resources and implementation of catchment scale mitigation measures. However the onus is on landowners to demonstrate the water quality outcomes are achievable and can be appropriately accounted for (and apportioned within properties/enterprises through the WRC accounting framework).</p> <p>The River Iwi do not support the granting of discharge permits [for the discharge of contaminants] of land use resource consents that lock in perceived rights to discharge contaminants with a duration of more than 10-years. It would be inappropriate for some properties and enterprises to avoid making future reductions in the discharge of contaminants that will be required to achieve Te Ture Whaimana in 80-years (by 2096).</p>
Policy 6 – Restricting land use change	PC1-4221	Woodacre Partnership	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information. The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>
Policy 6 – Restricting land use change	PC1-11533	Yule, Don, Lauris and Yvette	Oppose	<p>The River Iwi oppose amendments to Rule 3.11.5.7 and Policy 6 to provide for differential activity status from non-complying activity to discretionary, restricted discretionary, controlled or permitted activity based on poor and limited information. The river Iwi consider a restrictive approach to the management of land use change is required in the absence of robust and complete information needed to underpin and support a property-scale approach to managing the discharge of the four contaminants (eg, property-scale loads and resulting discharge permits etc).</p> <p>The River Iwi consider that applications for land use change [through rule 3.11.5.7] that demonstrate a sustained long-term increase in the discharge of one or more of the four contaminants must not be granted. The risk of poor land use change decisions is borne by the Waikato and Waipa Rivers and makes a mockery of the good work undertaken by other land users to decrease their discharge of contaminants.</p>

Table 1

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 7: Preparing for allocation in the future/Te Kaupapa Here 7: Kia takatū ki ngā tohanga hei ngā tau e heke mai ana				
Policy 7 – Future allocation	PC1-4314	A S Wilcox & Sons Ltd	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-6135	Ata Rangi 2015 Limited Partnership	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The deletion of bullet (a), (b), (c) and (d) is opposed by the River Iwi.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>

Table 1

Policy 7 – Future allocation	PC1-10880	Auckland/Waikato Fish and Game	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The proposal to move to a rights based regime where land users are allocated an in-perpetuity (in rem) right to discharge #kg of contaminant/ha/yr is premature. Robust information and data is required to quantify the discharge of contaminants from land use ahead of any discussion on the shape and form of a future allocation regime.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-9021	Bailey, James	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-6878	Ballance Agri-Nutrients Limited	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7</p>

Table 1

				<p>envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The proposal to move to a rights based regime where land users are allocated an in-perpetuity (in rem) right to discharge #kg of contaminant/ha/yr is premature. Robust information and data is required to quantify the discharge of contaminants from land use ahead of any discussion on the shape and form of a future allocation regime.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-11411	Balle Bros Group	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-11491	Beef + Lamb New Zealand Limited	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>

Table 1

<p>Policy 7 – Future allocation</p>	<p>PC1-8026</p>	<p>Black Jack Farms</p>	<p>Oppose</p>	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
<p>Policy 7 – Future allocation</p>	<p>PC1-7754</p>	<p>Charion Investment Trust</p>	<p>Oppose</p>	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi oppose the reframing of policy 7 as proposed.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
<p>Policy 7 – Future allocation</p>	<p>PC1-5562</p>	<p>Chhagn Bros Co Ltd</p>	<p>Support it Part</p>	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p>

Table 1

				<p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-7743	Clements, Robyn Ethel	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community.</p> <p>The deletion of Policy 7 is opposed by the River Iwi.</p>
Policy 7 – Future allocation	PC1-10782	CNI Iwi Land Management Limited	Support it Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-9729	Craig, Jeffery	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community.</p> <p>The deletion of Policy 7 is opposed by the River Iwi.</p>

Table 1

Policy 7 – Future allocation	PC1-10229	DairyNZ	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The deletion of bullet (a), (b), (c) and (d) is opposed by the River Iwi.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-10667	Department of Conservation	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The deletion of bullet (a), (b), (c) and (d) is opposed by the River Iwi.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-636	Dunlop, Tania	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community.</p> <p>The deletion of Policy 7 is opposed by the River Iwi.</p>
Policy 7 – Future allocation	PC1-10823	Federated Farmers of New Zealand	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new</p>

Table 1

				<p>allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The deletion of bullet (a), (b), (c) and (d) is opposed by the River Iwi.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-5945	Fletcher Trust	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The reframing of policy 7 to avoid future allocation is opposed by River Iwi.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-10474	Fonterra Co-operative Group Ltd	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The reframing of policy 7 to avoid future allocation is opposed by River Iwi.</p>

Table 1

				<p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-5204	Gardon Limited	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The reframing of policy 7 to avoid future allocation is opposed by River Iwi.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-6432	Gleeson, Graeme B	Support it Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>

Table 1

Policy 7 – Future allocation	PC1-10754	Hamilton City Council	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The addition of new bullet (ba) could have the effect of offsetting the requirement for urban centres to reduce existing contaminate discharges by providing head room for urban growth.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-7742	Hill Country Farmers Group	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The reframing of policy 7 to avoid future allocation is opposed by River Iwi.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-4126	Hira Bhana and Co Ltd	Support it Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7</p>

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				<p>envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-4126	Horticulture New Zealand (HortNZ)	Support it Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-5878	Huirimu Farms Ltd	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The deletion of bullet (b) is opposed by the River Iwi.</p>

Table 1

				<p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-7007	Jodean Farms	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The deletion of bullet (b) is opposed by the River Iwi.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-1832	Kilgour, Gareth	Support it Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>

Table 1

Policy 7 – Future allocation	PC1-8865	Lacewood Holdings Ltd	Support it Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-7236	Living Foods Ltd	Support it Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-3497	Matamata-Piako District Council	Support it Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p>

Table 1

				<p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-9295	Matira Sub Catchment Group	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community.</p> <p>The deletion of Policy 7 is opposed by the River Iwi.</p>
Policy 7 – Future allocation	PC1-9958	New Zealand Forest Owners Association Inc	Support it Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-8751	Nelson Farms Partnership	Support it Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new</p>

Table 1

				<p>allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-6423	Oji Fibre Solutions (NZ) Limited	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi oppose the reframing of policy 7 as a method.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-4191	Perfect Produce Co Ltd	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p>

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Policy 7 – Future allocation	PC1-11153	Primary Land Users Group	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-7789	Pukekohe Vegetable Growers Association Inc (PVGA)	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p>

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Policy 7 – Future allocation	PC1-4800	Pukerimu Farms Limited	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-6649	R.P O'Connor and Sons Ltd	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p>

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Policy 7 – Future allocation	PC1-10118	Ravensdown Limited	Support it Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-2505	Rotorua Lakes Council	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-5965	Rotor Work Limited	Oppose	The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new

Table 1

				<p>allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-5703	Save Lake Karapiro Inc	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-5465	Sieling Farms	Oppose	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. PC1 was developed using the best available scientific information and careful consideration of the freshwater objectives that are required to achieve Te Ture Whaimana while balancing the cultural, spiritual, social and economic wellbeing of the regional community.</p> <p>The deletion of Policy 7 is opposed by the River Iwi.</p>
Policy 7 – Future allocation	PC1-11103	Southern Pastures Limited Partnership	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p>

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Policy 7 – Future allocation	PC1-4044	South Waikato District Council	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The proposed re-drafting of Policy 7 to delete the first paragraph and the incorporation of only the footnote broadly defining ‘land suitability’ is opposed by the River Iwi.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-5112	Stark, Steven and Theresa	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The proposed re-drafting of Policy 7 and deletion of bullet (b) is opposed by the River Iwi.</p>

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				<p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-5567	Strang and Strang Limited	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-7055	Sutherland Produce Ltd	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-7055	Taupo District Council	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p>

Table 1

				<p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The decisions made by landowners to not undertake certain land uses or to reduce contaminant discharges are rewarded through continued operation of that land use (provided water quality targets have been achieved). The backdating of works undertaken prior to PC1 is a discussion that will need to occur when the future allocation regime is designed.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-8259	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The proposed re-drafting of Policy 7 and deletion of bullet (b) and (c) is opposed by the River Iwi.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-3323	Timberlands Limited	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The reframing of policy 7 to avoid future allocation is opposed by River Iwi.</p>

Table 1

				<p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-3963	Trustees of Highfield Deer Park	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-3801	Verry, Reon and Wendy	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The proposed re-drafting of Policy 7 and deletion of bullet (b) is opposed by the River Iwi.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-10944	Waikato Dairy Leaders Group	Oppose	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p>

Table 1

				<p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The reframing of policy 7 to avoid future allocation is opposed by River Iwi.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-11347	Wairakei Pastoral Ltd	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>The proposed insertion of new bullets that relate to resource consenting sub-catchment scale farming activities is opposed by River Iwi. Other objectives and policies deal with catchment scale planning.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-2112	Wairarapa Moana Incorporation	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p>

Table 1

				<p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>
Policy 7 – Future allocation	PC1-2270	Wai Shing Ltd	Support in Part	<p>The River Iwi consider the allocation of ‘rights to discharge’ contaminants from land use is a secondary consideration to achieving Te Ture Whaimana in the 80-year timeframe. However, the River Iwi also acknowledges that designing a new allocation regime to discharge contaminants at a property- or enterprise-level may assist to improve the future management of water quality in the Waikato and Waipā Rivers.</p> <p>Policy 7 is future focussed and works with Policy 4 —in “preparing for further diffuse discharge reductions” to signal further reductions in contaminants (post 2026) are probable to achieve Te Ture Whaimana. The River Iwi note Policy 7 envisages a “future property or enterprise-level allocation of diffuse discharges” regime may be developed and, sets out the need for information and data (collected through PC1) that will be required to assist making this decision.</p> <p>River Iwi consider mechanisms such as the polluter pays concept, resource rentals and the broader use of economic instruments will form the future work to design the allocation regime that underpins the rights to discharge contaminants post 2026.</p> <p>The River Iwi consider an allocation regime that is based on pure grand-parenting is unacceptable and note that in developing a new allocation regime, re-allocating rights to discharge contaminants will likely to provide for development opportunities on Multiple owned Maori land and Treaty Settlement lands.</p> <p>The River Iwi support changes to strengthen Policy 7, particularly around supporting the examination of the range of approaches to allocation including, but not limited to, “land suitability”.</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 8: Prioritised implementation/Te Kaupapa Here 8: Te raupapa o te whakatinanatanga				
Policy 8 – Prioritised implementation	PC1-6136	Ata Rangi 2015 Limited Partnership	Oppose	<p>The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. The 10-year timeframe to achieve Objective 3 (by 2026) would suggest the land uses located in the sub-catchments with the highest load of the four contaminants should put in place and implement mitigation measures as a priority.</p> <p>The deletion of policy 8 is opposed by the River Iwi.</p>
Policy 8 – Prioritised implementation	PC1-6136	Beef + Lamb New Zealand Limited	Support in Part	<p>The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. Prioritising implementation of PC1 should be undertaken using the best available science information. It may be possible to use data and information collected from the implementation of PC1 to refine targeting and prioritisation when the plan is reviewed for effectiveness and to make sure the prioritisation of sub-catchments is accurate.</p>

Table 1

				River Iwi support catchment based management and the use of catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.
Policy 8 – Prioritised implementation	PC1-7757	Charion Investment Trust	Oppose	The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. The 10-year timeframe to achieve Objective 3 (by 2026) would suggest the land uses located in the sub-catchments with the highest load of the four contaminants should put in place and implement mitigation measures as a priority. The deletion of policy 8 is opposed by the River Iwi.
Policy 8 – Prioritised implementation	PC1-6136	Department of Conservation	Support	The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. The River Iwi agree the lakes FMU sub-catchments should be included as part of priority 1, including Lake Waikare and the Whangamarino wetland
Policy 8 – Prioritised implementation	PC1-9794	Fertiliser Association of New Zealand	Support in Part	The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. Improving the readability of Policy 8 to remove the implementation of specific policies and tidy up the requirement that properties and enterprises that exceed the 75 th Percentile nitrogen leaching value fall into Priority 1 is supported by River Iwi. The strengthening of Policy 8 to improve the targeting and prioritisation of when properties and enterprises within sub-catchments must develop and put in place Farm Environment Plans is supported by River iwi
Policy 8 – Prioritised implementation	PC1-5949	Fletcher Trust	Oppose	The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. The 10-year timeframe to achieve Objective 3 (by 2026) would suggest the land uses located in the sub-catchments with the highest load of the four contaminants should put in place and implement mitigation measures as a priority. The deletion of policy 8 is opposed by the River Iwi.
Policy 8 – Prioritised implementation	PC1-5949	Fonterra Co-operative Group Ltd	Oppose	The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. The 10-year timeframe to achieve Objective 3 (by 2026) would suggest the land uses located in the sub-catchments with the highest load of the four contaminants should put in place and implement mitigation measures as a priority. The deletion of policy 8 is opposed by the River Iwi.
Policy 8 – Prioritised implementation	PC1-10867	Fulton Hogan Limited	Oppose	The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the long-term (by 2096) freshwater objective. If the targets are achieved before 2096, then the numerical attributes states in table 3.11-1 become the limits.
Policy 8 – Prioritised implementation	PC1-3609	GBC Winstone	Oppose	The language used in PC1 needs to be consistent with giving effect to Te Ture Whaimana and the NPS-FM. The River Iwi support the use of the term ‘targets’ to demonstrate current water quality needs to be improved to achieve the long-term (by 2096) freshwater objective. If the targets are achieved before 2096, then the numerical attributes states in table 3.11-1 become the limits.

Table 1

Policy 8 – Prioritised implementation	PC1-5949	Miraka Limited	Oppose	<p>The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. The 10-year timeframe to achieve Objective 3 (by 2026) would suggest the land uses located in the sub-catchments with the highest load of the four contaminants should put in place and implement mitigation measures as a priority.</p> <p>The deletion of policy 8 is opposed by the River Iwi.</p>
Policy 8 – Prioritised implementation	PC1-9541	Mercury NZ Limited	Support in Part	<p>The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. Improving the readability of Policy 8 to remove the implementation of specific policies and tidy up the requirement that properties and enterprises that exceed the 75th Percentile nitrogen leaching value fall into Priority 1 is supported by River Iwi. The removal of the word ‘prioritise’ is opposed by the River Iwi, as it is reasonably necessary to give the policy direction.</p> <p>The strengthening of Policy 8 to improve the targeting and prioritisation of when properties and enterprises within sub-catchments must develop and put in place Farm Environment Plans is supported by River iwi</p>
Policy 8 – Prioritised implementation	PC1-6292	Pouakani Trust	Oppose	<p>The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. The 10-year timeframe to achieve Objective 3 (by 2026) would suggest the land uses located in the sub-catchments with the highest load of the four contaminants should put in place and implement mitigation measures as a priority.</p> <p>The deletion of policy 8 is opposed by the River Iwi.</p>
Policy 8 – Prioritised implementation	PC1-5124	Ravensdown Limited	Support in Part	<p>The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. Improving the readability of Policy 8 to remove the implementation of specific policies and tidy up the requirement that properties and enterprises that exceed the 75th Percentile nitrogen leaching value fall into Priority 1 is supported by River Iwi.</p> <p>The strengthening of Policy 8 to improve the targeting and prioritisation of when properties and enterprises within sub-catchments must develop and put in place Farm Environment Plans is supported by River iwi</p>
Policy 8 – Prioritised implementation	PC1-5124	Stark, Steven and Theresa	Oppose	<p>The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. The 10-year timeframe to achieve Objective 3 (by 2026) would suggest the land uses located in the sub-catchments with the highest load of the four contaminants should put in place and implement sufficient mitigation measures as a priority.</p> <p>The deletion of policy 8 is opposed by the River Iwi.</p>
Policy 8 – Prioritised implementation	PC1-11348	Wairakei Pastoral Ltd	Oppose	<p>The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. Consideration of whether sub-catchment scale resource consents can be applied for outside of Certified Industry Schemes and for spatial areas, is better dealt with in Policy 9.</p> <p>The deletion of policy 8 is opposed by the River Iwi.</p>
Policy 8 – Prioritised implementation	PC1-3058	Waikato Regional Council	Support in Part	<p>The River Iwi support the WRC prioritising the sequencing for when properties and enterprises are required to undertake actions to give effect to the methods in the Proposed Plan. Improving the readability of Policy 8 to remove the</p>

Table 1

				<p>implementation of specific policies and tidy up the requirement that properties and enterprises that exceed the 75th Percentile nitrogen leaching value fall into Priority 1 is supported by River Iwi.</p> <p>The strengthening of Policy 8 to improve the targeting and prioritisation of when properties and enterprises within sub-catchments must develop and put in place Farm Environment Plans is supported by River Iwi</p>
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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding/Te Kaupapa Here 9: Te whakarite mahi whakangāwari, mahi ngātahi me te pūtea mō te riu kōawāwa (tae atu ki ngā taitapa)				
Policy 9 – Edge of field mitigation planning	PC1-4316	A S Wilcox & Sons Ltd	Support in Part	<p>The Waikato and Waipā River Iwi support coordinated sub-catchment planning (including edge of field) approaches that will assist properties and enterprises to achieve reductions in the discharge of the four contaminants.</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p>
Policy 9 – Edge of field mitigation planning	PC1-9073	B Das and Sons Ltd	Support in Part	<p>The Waikato and Waipā River Iwi support coordinated sub-catchment planning (including edge of field) approaches that will assist properties and enterprises to achieve reductions in the discharge of the four contaminants.</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p>
Policy 9 – Edge of field mitigation planning	PC1-11493	Beef + Lamb New Zealand Limited	Support in Part	<p>The Waikato and Waipā River Iwi support coordinated sub-catchment planning (including edge of field and catchment collective) approaches that will assist properties and enterprises to achieve reductions in the discharge of the four contaminants.</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p>

Table 1

				<p>The objective of sub-catchment planning should be to identify sub-catchment scale mitigations that will achieve the required reductions in contaminant discharges from properties and enterprises more effectively and at a reduced cost to those land owners. Coordinated planning is also likely to encourage and motivate landowners to undertake Farm Environment Planning with a view to sharing collective resources and putting in place and implementing mitigation measures at scale and more effectively and efficiently than smaller individual properties may achieve.</p> <p>River Iwi support the WRC resourcing (or in-kind/part funding) of catchment based management and catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p>
Policy 9 – Edge of field mitigation planning	PC1-7758	Charion Investment Trust	Oppose	<p>The Waikato and Waipā River Iwi support coordinated sub-catchment planning (including edge of field) approaches that will assist properties and enterprises to achieve reductions in the discharge of the four contaminants.</p> <p>The objective of sub-catchment planning should be to identify sub-catchment scale mitigations that will achieve the required reductions in contaminant discharges from properties and enterprises more effectively and at a reduced cost to those land owners. Coordinated planning is also likely to encourage and motivate landowners to undertake Farm Environment Planning with a view to sharing collective resources and putting in place and implementing mitigation measures at scale and more effectively and efficiently than smaller individual properties may achieve.</p> <p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p>
Policy 9 – Edge of field mitigation planning	PC1-5590	Chhagn Bros Co Ltd	Support in Part	<p>The Waikato and Waipā River Iwi support coordinated sub-catchment planning (including edge of field) approaches that will assist properties and enterprises to achieve reductions in the discharge of the four contaminants.</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p>
Policy 9 – Edge of field mitigation planning	PC1-10237	Dairy NZ	Support in Part	<p>The Waikato and Waipā River Iwi support coordinated sub-catchment planning (including edge of field) approaches that will assist properties and enterprises to achieve reductions in the discharge of the four contaminants.</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The objective of sub-catchment planning should be to identify sub-catchment scale mitigations that will achieve the required reductions in contaminant discharges from properties and enterprises more effectively and at a reduced cost to those land owners. Coordinated planning is also likely to encourage and motivate landowners to undertake Farm</p>

Table 1

				<p>Environment Planning with a view to sharing collective resources and putting in place and implementing mitigation measures at scale and more effectively and efficiently than smaller individual properties may achieve.</p> <p>River Iwi agree that land owners who put in place mitigation measures that will assist with achieving the 10% of the journey to achieve Te Ture Whaimana by 2026, ahead of the 2026 date should be recognised in some form.</p>
Policy 9 – Edge of field mitigation planning	PC1-10671	Department of Conservation	Oppose	<p>The Waikato and Waipā River Iwi support coordinated sub-catchment planning (including edge of field) approaches that will assist properties and enterprises to achieve reductions in the discharge of the four contaminants.</p> <p>The objective of sub-catchment planning should be to identify sub-catchment scale mitigations that will achieve the required reductions in contaminant discharges from properties and enterprises more effectively and at a reduced cost to those land owners. Coordinated planning is also likely to encourage and motivate landowners to undertake Farm Environment Planning with a view to sharing collective resources and putting in place and implementing mitigation measures at scale and more effectively and efficiently than smaller individual properties may achieve.</p> <p>Sub-catchment planning is one mechanism to achieve improved water quality outcomes at a greater scale than singular farm environment plans. River Iwi support the WRC resourcing (or in-kind/part funding) of catchment based management and catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p> <p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p>
Policy 9 – Edge of field mitigation planning	PC1-4569	Holmes, Gavin	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>Sub-catchment planning and catchment collectives -using catchment based planning— is one mechanism to achieve improved water quality outcomes at a greater scale than singular farm environment plans. River Iwi support the WRC resourcing (or in-kind/part funding) of catchment based management and catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p>
Policy 9 – Edge of field mitigation planning	PC1-10078	Horticulture New Zealand (HortNZ)	Support in Part	<p>The Waikato and Waipā River Iwi support coordinated sub-catchment planning (including edge of field) approaches that will assist properties and enterprises to achieve reductions in the discharge of the four contaminants.</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>Sub-catchment planning and catchment collectives -using catchment based planning— is one mechanism to achieve improved water quality outcomes at a greater scale than singular farm environment plans. River Iwi support catchment based management and catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures. However the onus is on landowners to demonstrate the water quality outcomes are achievable and can be appropriately accounted for (and apportioned within properties/enterprises through the WRC accounting framework).</p>

Table 1

				<p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 9 – Edge of field mitigation planning	PC1-6826	Jefferis, Daniel	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>Sub-catchment planning and catchment collectives -using catchment based planning— is one mechanism to achieve improved water quality outcomes at a greater scale than singular farm environment plans. River Iwi support the WRC resourcing (or in-kind/part funding) of catchment based management and catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p>
Policy 9 – Edge of field mitigation planning	PC1-1352	Jivan Produce Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 9 – Edge of field mitigation planning	PC1-5283	Living Foods Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>Sub-catchment planning and catchment collectives -using catchment based planning— is one mechanism to achieve improved water quality outcomes at a greater scale than singular farm environment plans. River Iwi support the WRC resourcing (or in-kind/part funding) of catchment based management and catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p>

Table 1

Policy 9 – Edge of field mitigation planning	PC1-5000	Makan Daya & Co Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 9 – Edge of field mitigation planning	PC1-8823	Miraka Limited	Oppose	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>Best Management Practice (BMP) and Good Management Practice (GMP) is already defined in PC1 and will form an integral part of Farm Environment Plans. To this extent GMP is already set out in Policy 3(d), amendments are not required in Policy 9. The River Iwi note that while important starting point, GMP may not, in all cases, be the 'silver bullet' solution to address water quality problems and achieve Te Ture Whaimana in 80-years (by 2096).</p>
Policy 9 – Edge of field mitigation planning	PC1-6870	Muir, Mark	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>Sub-catchment planning and catchment collectives -using catchment based planning— is one mechanism to achieve improved water quality outcomes at a greater scale than singular farm environment plans. River Iwi support the WRC resourcing (or in-kind/part funding) of catchment based management and catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p>
Policy 9 – Edge of field mitigation planning	PC1-6425	Oji Fibre Solutions (NZ) Limited	Oppose	<p>The Waikato and Waipā River Iwi support coordinated sub-catchment planning (including edge of field) approaches that will assist properties and enterprises to achieve reductions in the discharge of the four contaminants.</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The proposed deletion of Policy 9(d) is opposed by River Iwi as it sets the direction for apportioning fairly the reduction in contaminants that can be achieved through catchment scale mitigations through recognising relevant contributions to the overall reduction.</p> <p>River Iwi agree that land owners who put in place mitigation measures that will assist with achieving the 10% of the journey to achieve Te Ture Whaimana by 2026, ahead of the 2026 date should be recognised in some form.</p>

Table 1

Policy 9 – Edge of field mitigation planning	PC1-4193	Perfect Produce Co Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 9 – Edge of field mitigation planning	PC1-6293	Pouakani Trust	Oppose	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>Best Management Practice (BMP) and Good Management Practice (GMP) is already defined in PC1 and will form an integral part of Farm Environment Plans. To this extent GMP is already set out in Policy 3(d), amendments are not required in Policy 9. The River Iwi note that while important starting point, GMP may not, in all cases, be the 'silver bullet' solution to address water quality problems and achieve Te Ture Whaimana in 80-years (by 2096).</p>
Policy 9 – Edge of field mitigation planning	PC1-8253	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Oppose	<p>The Waikato and Waipā River Iwi support coordinated sub-catchment planning (including edge of field) approaches that will assist properties and enterprises to achieve reductions in the discharge of the four contaminants.</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The proposed deletion of Policy 9(d) is opposed by River Iwi as it sets the direction for apportioning fairly the reduction in contaminants that can be achieved through catchment scale mitigations through recognising relevant contributions to the overall reduction.</p> <p>River Iwi agree that land owners who put in place mitigation measures that will assist with achieving the 10% of the journey to achieve Te Ture Whaimana by 2026, ahead of the 2026 date should be recognised in some form.</p>
Policy 9 – Edge of field mitigation planning	PC1-6790	Twining, Murray Ian and Robyn Joy	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>Sub-catchment planning and catchment collectives -using catchment based planning— is one mechanism to achieve improved water quality outcomes at a greater scale than singular farm environment plans. River Iwi support the WRC resourcing (or in-kind/part funding) of catchment based management and catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p>

Table 1

<p>Policy 9 – Edge of field mitigation planning</p>	<p>PC1-11349</p>	<p>Wairakei Pastoral Ltd</p>	<p>Support in Part</p>	<p>The Waikato and Waipā River Iwi support coordinated sub-catchment planning (including edge of field) approaches that will assist properties and enterprises to achieve reductions in the discharge of the four contaminants.</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>Sub-catchment planning and catchment collectives -using catchment based planning— is one mechanism to achieve improved water quality outcomes at a greater scale than singular farm environment plans. River Iwi support catchment based management and catchment collectives where demonstrable water quality improvements can be gained through the effective and efficient use of resources and implementation of catchment scale mitigation measures. However the onus is on landowners to demonstrate the water quality outcomes are achievable and can be appropriately accounted for (and apportioned within properties/enterprises through the WRC accounting framework).</p> <p>River Iwi agree that land owners who put in place mitigation measures that will assist with achieving the 10% of the journey to achieve Te Ture Whaimana by 2026, ahead of the 2026 date should be recognised in some form.</p>
<p>Policy 9 – Edge of field mitigation planning</p>	<p>PC1-2274</p>	<p>Wai Shing Ltd</p>		<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
<p>Policy 9 – Edge of field mitigation planning</p>	<p>PC1-10323</p>	<p>Waitomo District Council</p>	<p>Support in Part</p>	<p>The Waikato and Waipā River Iwi support coordinated sub-catchment planning (including edge of field) approaches that will assist properties and enterprises to achieve reductions in the discharge of the four contaminants.</p> <p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The River Iwi support the prioritisation of effort to optimise the improvement in water quality outcomes for any resources expended by WRC. This would include sub-catchment planning and whether this is prioritised in the same way as the roll out of Farm Environment Plans. While sub-catchment planning is ultimately targeted at achieving freshwater outcomes, opportunities to integrate outcome to achieve biodiversity and biosecurity outcomes should be investigated.</p>

Table 1

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 10: Provide for point source discharges of regional significance/Te Kaupapa Here 10: Te whakataua i ngā rukenga i ngā pū tuwha e noho tāpua ana ki te rohe				
Policy 10 – Provide for regionally significant point source	PC1-9580	Advisory Committee on Regional Environment (ACRE)	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>Policy 10, 11 and 12 already apply to residential areas by targeting the discharge of point source contaminants. By definition this would include all discharge permits for waste water treatment plants and storm water systems that are not covered by discharge permits for waste water treatment systems.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096) or sooner where practicable.</p>
Policy 10 – Provide for regionally significant point source	PC1-7514	AFFCO New Zealand Limited	Oppose	<p>The Regional Policy Statement already contains the definition of Regionally Significant Industry. As the Regional Plan needs to give effect to the Regional Policy Statement there is little point in PC1 being amended as it will form part of the Regional Plan.</p>
Policy 10 – Provide for regionally significant point source	PC1-10884	Auckland/Waikato Fish and Game	Support in Part	<p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi would support the proposal to delete policy 10 and make this a consideration of policy 12, provided the wording “continued operation” is deleted and the wording “provide for” is replaced with “have regard to”.</p>
Policy 10 – Provide for regionally significant point source	PC1-9920	BT Mining	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-1403	Buckley, Carol	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa</p>

Table 1

				region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.
Policy 10 – Provide for regionally significant point source	PC1-10676	Department of Conservation	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>Subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1.</p>
Policy 10 – Provide for regionally significant point source	PC1-9796	Fertiliser Association of New Zealand	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-10598	Fonterra Co-operative Group Ltd	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally	PC1-10744	Fulton Hogan Limited	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p>

Table 1

significant point source				<p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-2883	GBC Winstone	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-8799	Genesis Energy Limited	Oppose	<p>The Regional Policy Statement already contains the definition of Regionally Significant Industry. As the Regional Plan must give effect to the Regional Policy Statement there is little point in PC1 being amended as it will form part of the Regional Plan.</p>
Policy 10 – Provide for regionally significant point source	PC1-2841	Graymont (NZ) Limited	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-10755	Hamilton City Council	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry</p>

Table 1

				<p>as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-5692	Hancock Forest Management (NZ) Ltd	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-6414	J Swap Ltd	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-7879	King Country Energy Limited	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>

Table 1

Policy 10 – Provide for regionally significant point source	PC1-3505	Matamata-Piako District Council	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-8315	McGovern, Annette	Oppose	<p>The Regional Policy Statement already contains the definition of Regionally Significant Industry. As the Regional Plan needs to give effect to the Regional Policy Statement there is little point in PC1 being amended as it will form part of the Regional Plan.</p>
Policy 10 – Provide for regionally significant point source	PC1-9572	Mercury NZ Limited	Oppose	<p>The Regional Policy Statement already contains the definition of Regionally Significant Industry. As the Regional Plan needs to give effect to the Regional Policy Statement there is little point in PC1 being amended as it will form part of the Regional Plan.</p>
Policy 10 – Provide for regionally significant point source	PC1-6871	Muir, Mark	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-3709	New Zealand Steel Ltd	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p>

Table 1

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Policy 10 – Provide for regionally significant point source	PC1-4831	NZ Transport Agency	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-2593	Oil Companies	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-6426	Oji Fibre Solutions (NZ) Limited	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally	PC1-11157	Primary Land Users Group	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.

Table 1

significant point source				<p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-2507	Rotorua Lakes Council	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-4056	South Waikato District Council	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-5026	Stevenson Resources Limited	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p>

Table 1

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Policy 10 – Provide for regionally significant point source	PC1-6519	Taniwha Estate Ltd	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-8112	Taupo District Council	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-8263	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Support in Part	<p>The Regional Policy Statement already contains the definition of Regionally Significant Industry. As the Regional Plan needs to give effect to the Regional Policy Statement there is little point in PC1 being amended as it will form part of the Regional Plan.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>

Table 1

Policy 10 – Provide for regionally significant point source	PC1-3978	Trustees of Highfield Deer Park	Oppose	The Regional Policy Statement already contains the definition of Regionally Significant Industry. As the Regional Plan needs to give effect to the Regional Policy Statement there is little point in PC1 being amended as it will form part of the Regional Plan.
Policy 10 – Provide for regionally significant point source	PC1-3321	Tuakau Proteins Limited	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use. The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.
Policy 10 – Provide for regionally significant point source	PC1-6792	Twining, Murray Ian and Robyn Joy	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use. The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.
Policy 10 – Provide for regionally significant point source	PC1-3129	Waikato District Council	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use. The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.

Table 1

Policy 10 – Provide for regionally significant point source	PC1-3129	Waikato Regional Council	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi acknowledge the need for flood and drainage infrastructure to operate effectively to convey flood flows. However the operation, maintenance and development of would-be “flood infrastructure” should not be at the detriment of important lakes and wetlands that have significant cultural and spiritual value to iwi. This is particularly where flood water is detained in wetland areas and the deposition of sediment degrades the values of existing wetlands. This outcome (if not remediated) unacceptable to River Iwi.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-11350	Waipā District Council	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-4700	Waipapa Farms Ltd and Carlyle Holdings Ltd	Oppose	<p>The Regional Policy Statement already contains the definition of Regionally Significant Industry. As the Regional Plan needs to give effect to the Regional Policy Statement there is little point in PC1 being amended as it will form part of the Regional Plan.</p>
Policy 10 – Provide for regionally significant point source	PC1-11350	Wairakei Pastoral Ltd	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p>

Table 1

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Policy 10 – Provide for regionally significant point source	PC1-2117	Wairarapa Moana Incorporation	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-10318	Waitomo District Council	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally significant point source	PC1-4230	Woodacre Partnership	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
Policy 10 – Provide for regionally	PC1-11537	Yule, Don, Lauris and Yvette	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.

Table 1

significant point source				<p>The River Iwi consider WRC should “have regard to” the continued operation of regionally significant infrastructure and regionally significant industry and not “provide for” regionally significant infrastructure and regionally significant industry as of right. While Regionally significant infrastructure and significant industries have a place in the Waikato and Waipa region, as point source discharges they should not be immune from reducing the discharge of the four contaminants in the same way as diffuse discharges of the four contaminants from land use.</p> <p>The River Iwi oppose the notion that PC1 should provide for the growth of regionally significant infrastructure and regionally significant industry as this is outside the scope of the plan change and would not [of itself] achieve the Te Ture Whaimana.</p>
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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges/Te Kaupapa Here 11: Te whakahāngai i te Kōwhiringa ka Tino Taea me ngā mahi whakangāwari pānga; te karo rānei i ngā pānga ki ngā rukenga i ngā pū tuwha				
Policy 11 – Application of BPO and mitigation offset for point source	PC1-9585	Advisory Committee on Regional Environment (ACRE)	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>Policy 10, 11 and 12 already apply to residential areas by targeting the discharge of point source contaminants. By definition this would include all discharge permits for waste water treatment plants and storm water systems that are not covered by discharge permits for waste water treatment systems.</p> <p>The River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096) or sooner where practicable.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-7636	AFFCO New Zealand Limited	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The application of “best practicable option” implies there is discretion for an applicant and consenting authority to determine whether the use of offsets is the best practicable option to reduce the four contaminants from point source discharges. The amendment to constrain the interpretation of “best practicable option” to just the use of offset mechanisms is not supported by the River Iwi, as the full range of on-site mitigations should be exhausted first.</p> <p>The River Iwi note the use of offsets can only occur when the accounting framework is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-4317	A S Wilcox & Sons Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment</p>

Table 1

				<p>from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-10887	Auckland/Waikato Fish and Game	Support in Part	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. The River Iwi agree the use of external offsets should only be utilised by point source discharges when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment, demonstrate a net reduction in the contaminant (to be reduced through any external offset) and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond] and needs to remain in place after the resource consent expires (if a resource consent is used).</p> <p>The River Iwi note the use of offsets can only occur when the accounting framework is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-9047	B Das and Sons Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-1487	Buckley, Peter	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. . The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p>

Table 1

				While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.
Policy 11 – Application of BPO and mitigation offset for point source	PC1-9924	BT Mining	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The application of “best practicable option” implies there is discretion for an applicant and consenting authority to determine whether the use of offsets is the best practicable option to reduce the four contaminants from point source discharges. The amendment to constrain the interpretation of “best practicable option” to just the use of offset mechanisms and to be located in the same FMU is not supported by the River Iwi, as the full range of on-site mitigations should be exhausted first and there is no direct linkage at a sub-catchment scale between the offset and the primary site.</p> <p>The River Iwi note the use of offsets can only occur when the accounting framework is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-5592	Chhagn Bros Co Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-10694	Department of Conservation	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment, show a net contaminant reduction and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation	PC1-1167	Eight Mile Farms Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p>

Table 1

offset for point source				<p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-10601	Fonterra Co-operative Group Ltd	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised by point source discharges when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment, demonstrate a net reduction in the contaminant (to be reduced through any external offset) and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>The proposed split of “Best Practicable Option” from offsets and as separate policies may be workable provided WRC design and develop an accounting framework that is capable of attributing the offset [reduction in the discharge of contaminants] from the nominated property/enterprise and balance across the principle point source discharge.</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-10747	Fulton Hogan Limited	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised by point source discharges when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment, demonstrate a net reduction in the contaminant (to be reduced through any external offset) and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>The proposed split of “Best Practicable Option” from offsets and as separate policies may be workable provided WRC design and develop an accounting framework that is capable of attributing the offset [reduction in the discharge of contaminants] from the nominated property/enterprise and balance across the principle point source discharge.</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation	PC1-2947	GBC Winstone	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised by point source discharges when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment, demonstrate a net reduction in the contaminant (to be reduced</p>

Table 1

offset for point source				<p>through any external offset) and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>The proposed split of “Best Practicable Option” from offsets and as separate policies may be workable provided WRC design and develop an accounting framework that is capable of attributing the offset [reduction in the discharge of contaminants] from the nominated property/enterprise and balance across the principle point source discharge.</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-8801	Genesis Energy Limited	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana. The use of external offsets should only be utilised by point source discharges when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment, demonstrate a net reduction in the contaminant (to be reduced through any external offset) and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>The amendment to constrain remove the consideration for the primary discharge to not result in any significant toxic adverse effect at the point source discharge location is opposed by River Iwi.</p> <p>The River Iwi note the use of offsets can only occur when the accounting framework is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-10758	Hamilton City Council	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond]. The suggestion to put in place an offset at any time in the duration of a discharge permit is opposed as this provide zero certainty to River Iwi that the net discharge of contaminants from different sites is reduced. The introduction of the note in subsection (d) is workable with the exception of the last sentence which will be difficult to account for in an accounting framework (the offset is either effective immediately, or it should not be considered an offset).</p> <p>WRC would also need to develop the accounting framework in a way that was capable of attributing the offset [reduction in the discharge of contaminants] from the nominated property/enterprise and balance across the principle point source discharge.</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>

Table 1

Policy 11 – Application of BPO and mitigation offset for point source	PC1-4130	Hira Bhana and Co Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-4574	Holmes, Gavin	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-6829	Jefferis, Daniel	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation	PC1-6417	J Swap Ltd	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised by point source discharges when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi</p>

Table 1

offset for point source				<p>consider any offset should be in the same sub-catchment, demonstrate a net reduction in the contaminant (to be reduced through any external offset) and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>The proposed split of “Best Practicable Option” from offsets and as separate policies may be workable provided WRC design and develop an accounting framework that is capable of attributing the offset [reduction in the discharge of contaminants] from the nominated property/enterprise and balance across the principle point source discharge.</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-5284	Living Foods Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-9972	Lumbercorp NZ Ltd	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The application of “best practicable option” implies there is discretion for an applicant and consenting authority to determine whether the use of offsets is the best practicable option to reduce the four contaminants from point source discharges. The amendment to constrain the interpretation of “best practicable option” to just the use of offset mechanisms is not supported by the River Iwi, as the full range of on-site mitigations should be exhausted first.</p> <p>The River Iwi note the use of offsets can only occur when the accounting framework is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-3507	Matamata-Piako District Council	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond]. The suggestion to put in place an offset at any time in the duration of a discharge permit is opposed as this provide zero certainty to River Iwi that the net discharge of contaminants from different sites is reduced.</p>

Table 1

				<p>WRC would also need to develop the accounting framework in a way that was capable of attributing the offset [reduction in the discharge of contaminants] from the nominated property/enterprise and balance across the principle point source discharge.</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-3713	New Zealand Steel Ltd	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The application of “best practicable option” implies there is discretion for an applicant and consenting authority to determine whether the use of offsets is the best practicable option to reduce the four contaminants from point source discharges. The amendment to constrain the interpretation of “best practicable option” to just the use of offset mechanisms is not supported by the River Iwi, as the full range of on-site mitigations should be exhausted first.</p> <p>The River Iwi note the use of offsets can only occur when the accounting framework is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-6547	Oji Fibre Solutions (NZ) Limited	Oppose	<p>The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.</p> <p>The application of “best practicable option” implies there is discretion for an applicant and consenting authority to determine whether the use of offsets is the best practicable option to reduce the four contaminants from point source discharges. The amendment to constrain the interpretation of “best practicable option” to just the use of offset mechanisms is not supported by the River Iwi, as the full range of on-site mitigations should be exhausted first.</p> <p>The River Iwi note the use of offsets can only occur when the accounting framework is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-4149	Perfect Produce Co Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>

Table 1

Policy 11 – Application of BPO and mitigation offset for point source	PC1-11159	Primary Land Users Group	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-2508	Rotorua Lakes Council	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond]. The suggestion to delete the offset measure being for the same contaminant is opposed as this provide zero certainty to River Iwi that the net discharge of the identified contaminant would be reduced.</p> <p>WRC would also need to develop the accounting framework in a way that was capable of attributing the offset [reduction in the discharge of contaminants] from the nominated property/enterprise and balance across the principle point source discharge.</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-4059	South Waikato District Council	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond]. The suggestion to put in place an offset at any time in the duration of a discharge permit is opposed as this provide zero certainty to River Iwi that the net discharge of contaminants from different sites is reduced.</p> <p>WRC would also need to develop the accounting framework in a way that was capable of attributing the offset [reduction in the discharge of contaminants] from the nominated property/enterprise and balance across the principle point source discharge.</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>

Table 1

Policy 11 – Application of BPO and mitigation offset for point source	PC1-5027	Stevenson Resources Limited	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised by point source discharges when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment, demonstrate a net reduction in the contaminant (to be reduced through any external offset) and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>The proposed split of “Best Practicable Option” from offsets and as separate policies may be workable provided WRC design and develop an accounting framework that is capable of attributing the offset [reduction in the discharge of contaminants] from the nominated property/enterprise and balance across the principle point source discharge.</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-7068	Sutherland Produce Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (from one property or enterprise) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-6521	Taniwha Estate Ltd	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised by point source discharges when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment, demonstrate a net reduction in the contaminant (to be reduced through any external offset) and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>The proposed split of “Best Practicable Option” from offsets and as separate policies may be workable provided WRC design and develop an accounting framework that is capable of attributing the offset [reduction in the discharge of contaminants] from the nominated property/enterprise and balance across the principle point source discharge.</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years 2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>

Table 1

Policy 11 – Application of BPO and mitigation offset for point source	PC1-8115	Taupo District Council	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>WRC would also need to develop the accounting framework in a way that was capable of attributing the offset [reduction in the discharge of contaminants] from the nominated property/enterprise and balance across the principle point source discharge.</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-3331	Tuakau Proteins Limited	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment, show a net contaminant reduction and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-6793	Twining, Murray Ian and Robyn Joy	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-3832	Verry, Reon and Wendy	Support in Part	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment, show a net contaminant reduction and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p>

Table 1

				While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.
Policy 11 – Application of BPO and mitigation offset for point source	PC1-11561	Waikato River Authority	Support	<p>The River Iwi view PC1 as an important first step on the journey toward achieving the 80-year long-term freshwater objective to achieve Te Ture Whaimana. The use of external offsets should only be utilised when the full range of cost effective and on-site mitigation measures to reduce contaminants are exhausted. River Iwi consider any offset should be in the same sub-catchment, show a net contaminant reduction and will require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-11351	Wairakei Pastoral Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation offset for point source	PC1-2287	Wai Shing Ltd	Support in Part	<p>PC1 was developed using the best available scientific information and included flexibility to put in place workable solutions on land to reduce the discharge of the four contaminants (this includes the opportunity to use internal offset mitigations that can be recorded in farm environment plans).</p> <p>The use of external offsets (between spatially different properties or enterprises) for diffuse sources of contaminant discharges could be workable once the accounting framework [which needs to be designed and developed] is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment. The offset would also require a legal mechanism to guarantee the durability of the offset [binding agreement/covenant/bond].</p> <p>While River Iwi support amendments which strengthen the intent of PC1 to achieve the short-term freshwater objectives in 10-years (2026) and ultimately, Te Ture Whaimana in 80-years (2096), the use of offsets for diffuse source discharges requires a precautionary approach.</p>
Policy 11 – Application of BPO and mitigation	PC1-8112	Watercare Services Ltd	Oppose	The River Iwi support the 10-year target (2026) for putting in place and implementing the sum-total of mitigation measures that would collectively achieve 10% of the journey towards achieving Te Ture Whaimana.

Table 1

offset for point source				<p>The application of “best practicable option” implies there is discretion for an applicant and consenting authority to determine whether the use of offsets is the best practicable option to reduce the four contaminants from point source discharges. The amendment to constrain the interpretation of “best practicable option” to just the use of offset mechanisms is not supported by the River Iwi, as the full range of on-site mitigations should be exhausted first.</p> <p>The River Iwi note the use of offsets can only occur when the accounting framework is operational and capable of tracking and attributing the reduction in the quantum of contaminants discharged to a sub-catchment from changes/reductions in discharges elsewhere (on land) in the same sub-catchment.</p>
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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 12: Additional considerations for point source discharges in relation to water quality targets/Te =Kaupapa Here 12: He take anō hei whakaaro ake mō ngā rukenga i ngā pū tuwha e pā ana ki ngā whāinga ā-kounga wai				
Policy 12 – Additional considerations for point source	PC1-6896	Ballance Agri-Nutrients Limited	Support in Part	Policy 12 must be read in the context of assisting decision-makers to determine the appropriate reduction of contaminants from point source discharges “within a sub-catchment” and the timing/staging of when reductions will occur. The River Iwi are of the view that Policy 12 must not be used by the operators of point source infrastructure to avoid upgrading that infrastructure (and/or putting in place and implementing offset mitigations) that would reduce contaminants commensurate to achieving Objective 1 and 3. Therefore the River Iwi consider (d) should be deleted and the wording “within a sub-catchment” to the header of Policy 12.
Policy 12 – Additional considerations for point source	PC1-6365	Cameron, Bruce	Support in Part	Policy 12 must be read in the context of assisting decision-makers to determine the appropriate reduction of contaminants from point source discharges “within a sub-catchment” and the timing/staging of when reductions will occur. The River Iwi are of the view that Policy 12 must not be used by the operators of point source infrastructure to avoid upgrading that infrastructure (and/or putting in place and implementing offset mitigations) that would reduce contaminants commensurate to achieving Objective 1 and 3. Therefore the River Iwi consider (d) should be deleted and the wording “within a sub-catchment” to the header of Policy 12.
Policy 12 – Additional considerations for point source	PC1-1168	Eight Mile Farms Ltd	Support in Part	Policy 12 must be read in the context of assisting decision-makers to determine the appropriate reduction of contaminants from point source discharges “within a sub-catchment” and the timing/staging of when reductions will occur. The River Iwi are of the view that Policy 12 must not be used by the operators of point source infrastructure to avoid upgrading that infrastructure (and/or putting in place and implementing offset mitigations) that would reduce contaminants commensurate to achieving Objective 1 and 3. Therefore the River Iwi consider (d) should be deleted and the wording “within a sub-catchment” to the header of Policy 12.
Policy 12 – Additional considerations for point source	PC1-9798	Fertiliser Association of New Zealand	Support in Part	Policy 12 must be read in the context of assisting decision-makers to determine the appropriate reduction of contaminants from point source discharges “within a sub-catchment” and the timing/staging of when reductions will occur. The River Iwi are of the view that Policy 12 must not be used by the operators of point source infrastructure to avoid upgrading that infrastructure (and/or putting in place and implementing offset mitigations) that would reduce contaminants commensurate

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				to achieving Objective 1 and 3. Therefore the River Iwi consider (d) should be deleted and the wording “within a sub-catchment” to the header of Policy 12.
Policy 12 – Additional considerations for point source	PC1-10609	Fonterra Co-operative Group Ltd	Support in Part	Policy 12 must be read in the context of assisting decision-makers to determine the appropriate reduction of contaminants from point source discharges “within a sub-catchment” and the timing/staging of when reductions will occur. The River Iwi are of the view that Policy 12 must not be used by the operators of point source infrastructure to avoid upgrading that infrastructure (and/or putting in place and implementing offset mitigations) that would reduce contaminants commensurate to achieving Objective 1 and 3. Therefore the River Iwi consider (d) should be deleted and the wording “within a sub-catchment” to the header of Policy 12.
Policy 12 – Additional considerations for point source	PC1-10749	Fulton Hogan Limited	Support in Part	Policy 12 must be read in the context of assisting decision-makers to determine the appropriate reduction of contaminants from point source discharges “within a sub-catchment” and the timing/staging of when reductions will occur. The River Iwi are of the view that Policy 12 must not be used by the operators of point source infrastructure to avoid upgrading that infrastructure (and/or putting in place and implementing offset mitigations) that would reduce contaminants commensurate to achieving Objective 1 and 3. Therefore the River Iwi consider (d) should be deleted and the wording “within a sub-catchment” to the header of Policy 12.
Policy 12 – Additional considerations for point source	PC1-2958	GBC Winstone	Support in Part	Policy 12 must be read in the context of assisting decision-makers to determine the appropriate reduction of contaminants from point source discharges “within a sub-catchment” and the timing/staging of when reductions will occur. The River Iwi are of the view that Policy 12 must not be used by the operators of point source infrastructure to avoid upgrading that infrastructure (and/or putting in place and implementing offset mitigations) that would reduce contaminants commensurate to achieving Objective 1 and 3. Therefore the River Iwi consider (d) should be deleted and the wording “within a sub-catchment” to the header of Policy 12.
Policy 12 – Additional considerations for point source	PC1-10609	Hamilton City Council	Oppose	<p>The River Iwi consider the amendments to Policy 12 is redundant as the policy already applies to point source discharges and the policy is directing consideration which would occur through a resource consent process, but is also equally applicable to applicants outside of a resource consent process.</p> <p>The addition of the works “where applicable: are opposed by the River Iwi. The best available science information indicates future reductions of contaminants will be required to achieve Te Ture Whaimana. In this instance, future reductions WILL BE required and is particularly relevant where long-term duration discharge permits are being sought for point source discharges.</p> <p>The insertion of new (e) and (f) are opposed by River Iwi as these matters can be worked through during the “consideration” of the extent to which reductions of the contaminants from point source discharges are being anticipated.</p>
Policy 12 – Additional considerations for point source	PC1-4575	Holmes, Gavin	Support in Part	Policy 12 must be read in the context of assisting decision-makers to determine the appropriate reduction of contaminants from point source discharges “within a sub-catchment” and the timing/staging of when reductions will occur. The River Iwi are of the view that Policy 12 must not be used by the operators of point source infrastructure to avoid upgrading that infrastructure (and/or putting in place and implementing offset mitigations) that would reduce contaminants commensurate to achieving Objective 1 and 3. Therefore the River Iwi consider (d) should be deleted and the wording “within a sub-catchment” to the header of Policy 12.

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Policy 12 – Additional considerations for point source	PC1-9996	Lumber Corp NZ Ltd	Oppose	The River Iwi consider the amendments to Policy 12 is redundant as the policy already applies to point source discharges and the policy is directing consideration which would occur through a resource consent process, but is also equally applicable to applicants outside of a resource consent process.
Policy 12 – Additional considerations for point source	PC1-3717	New Zealand Steel Ltd	Oppose	The River Iwi consider the amendments to Policy 12 is redundant as the policy already applies to point source discharges and the policy is directing consideration which would occur through a resource consent process, but is also equally applicable to applicants outside of a resource consent process.
Policy 12 – Additional considerations for point source	PC1-2596	Oil Companies	Support in Part	The River Iwi oppose the inclusion of diffuse sources of contaminants being referenced in Policy 12.
Policy 12 – Additional considerations for point source	PC1-3717	Oji Fibre Solutions (NZ) Limited	Oppose	<p>The River Iwi consider the amendments to Policy 12 is redundant as the policy already applies to point source discharges and the policy is directing consideration which would occur through a resource consent process, but is also equally applicable to applicants outside of a resource consent process.</p> <p>The best practicable option is already an integral part of (d) and does not require repetition in (b). New (e) is not required as policy 10 addresses regionally significant industry.</p> <p>The River Iwi oppose the deletion of “and meet the water quality targets specified above [Table 3.11-1]” and are of the view that Policy 12 must not be used by the operators of point source infrastructure to avoid upgrading that infrastructure (and/or putting in place and implementing offset mitigations) that would reduce contaminants commensurate to achieving Objective 1 and 3.</p>
Policy 12 – Additional considerations for point source	PC1-5968	Pamu Farms of New Zealand	Support in Part	<p>The River Iwi consider point source discharges must do their bit to assist with achieving Te Ture Whaimana in 80-years (by 2096). Amendments to Policy 12 that dilute the intent or provide pathways to avoid point source discharges from making any reduction of contaminants are opposed by the River Iwi.</p> <p>The River Iwi are of the view that Policy 12 must not be used by the operators of point source infrastructure to avoid upgrading that infrastructure (and/or putting in place and implementing offset mitigations) that would reduce contaminants commensurate to achieving Objective 1 and 3. Therefore the River Iwi consider (d) should be deleted and the wording “within a sub-catchment” to the header of Policy 12.</p>
Policy 12 – Additional considerations for point source	PC1-4091	South Waikato District Council	Oppose	The River Iwi consider the amendments to Policy 12 is redundant as the policy already applies to point source discharges and the policy is directing consideration which would occur through a resource consent process, but is also equally applicable to applicants outside of a resource consent process.
Policy 12 – Additional	PC1-5028	Stevenson Resources Limited	Support in Part	Policy 12 must be read in the context of assisting decision-makers to determine the appropriate reduction of contaminants from point source discharges “within a sub-catchment” and the timing/staging of when reductions will occur. The River Iwi are of the view that Policy 12 must not be used by the operators of point source infrastructure to avoid upgrading that

Table 1

considerations for point source				infrastructure (and/or putting in place and implementing offset mitigations) that would reduce contaminants commensurate to achieving Objective 1 and 3. Therefore the River Iwi consider (d) should be deleted and the wording “within a sub-catchment” to the header of Policy 12.
Policy 12 – Additional considerations for point source	PC1-8116	Taupo District Council	Support in Part	<p>Policy 12 must be read in the context of assisting decision-makers to determine the appropriate reduction of contaminants from point source discharges “within a sub-catchment” and the timing/staging of when reductions will occur. The River Iwi are of the view that Policy 12 must not be used by the operators of point source infrastructure to avoid upgrading that infrastructure (and/or putting in place and implementing offset mitigations) that would reduce contaminants commensurate to achieving Objective 1 and 3. Therefore the River Iwi consider (d) should be deleted and the wording “within a sub-catchment” to the header of Policy 12.</p> <p>Policy 11 already provides guidance for the potential use of offsets when the application of the Best Practicable Option may not achieve the required reduction in contaminant discharges. The River Iwi consider there is a risk that clause (d) could be used by the operators of point source infrastructure to avoid making meaningful reductions of the four contaminants because of diminishing returns on investment, irrespective of the relative contribution of the point source discharge in the sub-catchment.</p>
Policy 12 – Additional considerations for point source	PC1-4091	Waikato Regional Council	Oppose	The River Iwi acknowledge the need for flood and drainage infrastructure to operate effectively to convey flood flows. However the operation, maintenance and development of would-be “flood infrastructure” should not be at the detriment of important lakes and wetlands that have significant cultural and spiritual value to iwi. This is particularly where flood water is detained in wetland areas and the deposition of sediment degrades the values of existing wetlands. This outcome (if not remediated) unacceptable to River Iwi.
Policy 12 – Additional considerations for point source	PC1-11562	Waikato River Authority	Support	The River Iwi support the addition of “no further degradation” in Policy 12. Point source discharges need to demonstrate they are making a contribution to the reduction in the discharge of the four contaminants and assisting to achieve Te Ture Whaimana in 80-years (by 2096).
Policy 12 – Additional considerations for point source	PC1-11352	Wairakei Pastoral Ltd	Support in Part	The River Iwi oppose the inclusion of diffuse sources of contaminants being referenced in Policy 12.
Policy 12 – Additional considerations for point source	PC1-10320	Waitomo District Council	Oppose	The River Iwi consider Policy 6 sets up a managed pathway for land use change that “holds the line” for 10-years (to 2026). The policy was never intended to be an open ended look at intensification within a sector and is, instead, a blunt way of preventing unchecked and unmanaged land use change. Policy 10, 11 and 12 deal explicitly with point source discharges and not subject to land use change that would increase the level of contaminants. The River Iwi consider the Regional Plan and Regional Policy Statement already provides for urban growth within the Waikato Region and there is no justification for a new and duplicate policy in PC1. Collectively, urban land uses need to demonstrate they are making a contribution to the reduction in the discharge of the four contaminants and assisting to achieve Te Ture Whaimana in 80-years (by 2096).

Table 1

Policy 12 – Additional considerations for point source	PC1-5187	Watercare Services Ltd	Oppose	The River Iwi consider point source discharges must do their bit to assist with achieving Te Ture Whaimana in 80-years (by 2096). Amendments to Policy 12 that dilute the intent or provide pathways to avoid point source discharges from making any reduction of contaminants are opposed by the River Iwi.
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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 13: Point sources consent duration/Te Kaupapa Here 13: Te roa o te tukanga tonu whakaaetanga mō te pū tuwha				
Policy 13 –Point source consent duration	PC1-10900	Auckland/Waikato Fish and Game	Support in Part	The River Iwi support the deletion of (a) and amendment to (c) to qualify what is meant by “contaminant reduction” to ensure minimal reductions are not used to leverage long-term duration and trigger the mis-use of “investment certainty” as a default to avoid making necessary reductions of contaminants.
Policy 13 –Point source consent duration	PC1-6897	Ballance Agri-Nutrients Limited	Oppose	The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges. The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).
Policy 13 –Point source consent duration	PC1-6367	Cameron, Bruce	Oppose	The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges. The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). Amendments proposed to open Policy 13 to diffuse sources of contaminants is opposed by the River Iwi.
Policy 13 –Point source consent duration	PC1-7379	Contact Energy Limited	Oppose	The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges. The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four

Table 1

				contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).
Policy 13 –Point source consent duration	PC1-10830	Federated Farmers of New Zealand	Oppose	<p>The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.</p> <p>The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).</p>
Policy 13 –Point source consent duration	PC1-9799	Fertiliser Association of New Zealand	Oppose	<p>The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.</p> <p>The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).</p>
Policy 13 –Point source consent duration	PC1-1169	Eight Mile Farms Ltd	Support in Part	The River Iwi support the requirement for point source discharges to put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).
Policy 13 –Point source consent duration	PC1-10610	Fonterra Co-operative Group Ltd	Support in Part	The River Iwi support the amendments to Policy 13 that would have the same effect as ensuring point source discharge put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) that proportionately reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). However, River Iwi contend a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.
Policy 13 –Point source consent duration	PC1-10818	Fulton Hogan Limited	Support in Part	The River Iwi support the amendments to Policy 13 that would have the same effect as ensuring point source discharge put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) that proportionately reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).

Table 1

				However, River Iwi oppose a 35-year duration outright, and contend a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.
Policy 13 –Point source consent duration	PC1-2966	GBC Winstone	Support in Part	The River Iwi support the amendments to Policy 13 that would have the same effect as ensuring point source discharge put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) that proportionately reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). However, River Iwi oppose a 35-year duration outright, and contend a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.
Policy 13 –Point source consent duration	PC1-2844	Graymont (NZ) Limited	Oppose	The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges. The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).
Policy 13 –Point source consent duration	PC1-11038	Hamilton City Council	Oppose	The River Iwi support the amendments to Policy 13 that would have the same effect as ensuring point source discharge put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) that proportionately reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). The River Iwi oppose new (d) and a 35-year duration outright, and contend a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.
Policy 13 –Point source consent duration	PC1-4577	Holmes, Gavin	Oppose	The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges. The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). Amendments proposed to open Policy 13 to diffuse sources of contaminants is opposed by the River Iwi.
Policy 13 –Point source consent duration	PC1-5891	Huirimu Farms Ltd	Support in Part	The River Iwi support the requirement for point source discharges to put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).

Table 1

Policy 13 –Point source consent duration	PC1-6433	J Swap Ltd	Support in Part	The River Iwi support the amendments to Policy 13 that would have the same effect as ensuring point source discharge put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) that proportionately reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). However, River Iwi oppose a 35-year duration outright, and contend a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.
Policy 13 –Point source consent duration	PC1-6831	Jefferis, Daniel	Oppose	The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges. The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). Amendments proposed to open Policy 13 to diffuse sources of contaminants is opposed by the River Iwi.
Policy 13 –Point source consent duration	PC1-7928	King Country Energy Limited	Oppose	The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges. The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).
Policy 13 –Point source consent duration	PC1-9998	Lumbercorp NZ Ltd	Oppose	The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges. The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).
Policy 13 –Point source consent duration	PC1-3509	Matamata-Piako District Council	Support in Part	The River Iwi support the amendments to Policy 13 that would have the same effect as ensuring point source discharge put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) that proportionately reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).

Table 1

				However, River Iwi oppose a 30-year duration outright, and contend a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.
Policy 13 –Point source consent duration	PC1-6875	Muir, Mark	Oppose	<p>The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.</p> <p>The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).</p>
Policy 13 –Point source consent duration	PC1-3720	New Zealand Steel Ltd	Oppose	<p>The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.</p> <p>The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).</p>
Policy 13 –Point source consent duration	PC1-2595	Oil Companies	Oppose	<p>The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.</p> <p>The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).</p>
Policy 13 –Point source consent duration	PC1-6561	Oji Fibre Solutions (NZ) Limited	Support	The River Iwi support the deletion of (a).
Policy 13 –Point source consent duration	PC1-5969	Pamu Farms of New Zealand	Oppose	<p>The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.</p> <p>The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four</p>

Table 1

				contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). Amendments proposed to open Policy 13 to diffuse sources of contaminants is opposed by the River Iwi.
Policy 13 –Point source consent duration	PC1-11161	Primary Land Users Group	Oppose	The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges. The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). Amendments proposed to open Policy 13 to diffuse sources of contaminants is opposed by the River Iwi.
Policy 13 –Point source consent duration	PC1-5733	Save Lake Karapiro Inc	Oppose	The River Iwi support the requirement for point source discharges to put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).
Policy 13 –Point source consent duration	PC1-4095	South Waikato District Council	Oppose	The River Iwi support the amendments to Policy 13 that would have the same effect as ensuring point source discharge put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) that proportionately reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). However, River Iwi oppose a 30-year duration outright, and contend a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.
Policy 13 –Point source consent duration	PC1-5747	Stevenson Resources Limited	Oppose	The River Iwi support the amendments to Policy 13 that would have the same effect as ensuring point source discharge put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) that proportionately reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). However, River Iwi oppose a 30-year duration outright, and contend a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.
Policy 13 –Point source consent duration	PC1-8117	Taupo District Council	Oppose	The River Iwi support the amendments to Policy 13 that would have the same effect as ensuring point source discharge put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) that proportionately reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). However, River Iwi oppose a 35-year duration outright, and contend a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.

Table 1

Policy 13 –Point source consent duration	PC1-8325	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Support in Part	The River Iwi support the amendments to (a) to delete “a consent term exceeding 25 years” and addition of wording that addresses the extent of reductions to the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1) for 80-years.
Policy 13 –Point source consent duration	PC1-3095	Waikato Regional Council	Support in Part	The River Iwi support the amendments to Policy 13 that would have the same effect as ensuring point source discharge put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) that proportionately reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). However, River Iwi contend a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.
Policy 13 –Point source consent duration	PC1-3137	Waikato District Council	Oppose	The River Iwi support the amendments to Policy 13 that would have the same effect as ensuring point source discharge put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) that proportionately reduce the discharge of the four contaminants (including microbial pathogens) to assist with achieving the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). However, River Iwi oppose a 30-year duration outright, and contend a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.
Policy 13 –Point source consent duration	PC1-2710	Waikato Federated Farmers Meat & Fibre Industry Group	Oppose	The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges. The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). Amendments proposed to open Policy 13 to diffuse sources of contaminants is opposed by the River Iwi.
Policy 13 –Point source consent duration	PC1-11353	Wairakei Pastoral Ltd	Oppose	The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges. The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years). Amendments proposed to open Policy 13 to diffuse sources of contaminants is opposed by the River Iwi.

Table 1

Policy 13 –Point source consent duration	PC1-2120	Wairarapa Moana Incorporation	Oppose	<p>The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.</p> <p>The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).</p>
Policy 13 –Point source consent duration	PC1-8337	Waitomo District Council	Oppose	<p>The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.</p> <p>The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).</p>
Policy 13 –Point source consent duration	PC1-8337	Watercare Services Ltd	Oppose	<p>The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.</p> <p>The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).</p>
Policy 13 –Point source consent duration	PC1-4236	Woodacre Partnership	Oppose	<p>The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.</p> <p>The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).</p>
Policy 13 –Point source consent duration	PC1-11540	Yule, Don, Lauris and Yvette	Oppose	<p>The River Iwi consider a 25-year duration for resource consents —as set out in (a)— should not be the mandatory starting for point source discharges.</p> <p>The River Iwi would support amendments to either delete the wording “A consent term exceeding 25-years” OR amend policy 13 to include a new matter of consideration that links resource consent duration to the degree/extent to which a</p>

Table 1

				<p>point source discharge will put in place mitigation measures (including the use of the Best Practicable Option and the use of offsets —noting the matters raised by River Iwi on Policy 11) to proportionately reduce the discharge of the four contaminants (including microbial pathogens) set against the water quality targets for the relevant sub-catchment (Table 3.11-1 for 80-years).</p> <p>Amendments proposed to open Policy 13 to diffuse sources of contaminants is opposed by the River Iwi.</p>
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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 14: Lakes Freshwater Management Units/Te Kaupapa Here 14: Ngā Wae Whakahaere Wai Māori i ngā Roto				
Policy 14 –Lakes FMU	PC1-9800	Fertiliser Association of New Zealand	Oppose	The River Iwi considers the Vision and Strategy requires the restoration and protection of the Waikato and Waipā River. As PC1 must give effect to the Vision and Strategy it is appropriate to use the language “restore and protect” to apply to lakes located within the Waikato and Waipā River catchment.
Policy 14 –Lakes FMU	PC1-8335	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Support in Part	<p>The River Iwi would support the restoration and protection of Lakes within Lakes FMU ahead of 2096.</p> <p>The River Iwi consider the WRC needs to be proactive in managing improvements (restore and protect) to the water quality of the four lake types within the Lakes FMU. While developing Lake Catchment Plans is a good first step, the plans need to target mitigation measures and management actions on land use within lake catchments, that will demonstrably water quality over time. However, it is unclear how coordinated sub-catchment planning —signaled in Policy 9— relates to the development of Lake Catchment Plans and whether all the lakes are denoted as priority 1.</p> <p>In any event, the River Iwi would expect to see the Lake Catchment Plans completed well before 2026 and in a way that is consistent with Policy 14 and amendments to Method 3.11.4.4</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land/Te Kaupapa Here 16: Te hangore o te tukanga mō te whakawhanaketanga o ngā whenua e whakahokia ai i raro i ngā whakataunga kokoraho o Te Tiriti o Waitangi me ngā whenua Māori kei raro i te mana whakahaere o te takitini				
Policy 16 – Flexibility to develop ML and TSL	PC1-1678	Ashdale Enterprises Ltd	Oppose	<p>The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands.</p> <p>Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. The process to design of PC1 recognised that Rule 3.11.5.7 provides a further barrier for the owners of Multiple owned Maori land and Treaty Settlement land to overcome in order to develop their lands. The River Iwi oppose policy 16 being extended to include all land types (eg, general freehold land).</p>

Table 1

Policy 16 – Flexibility to develop ML and TSL	PC1-7664	AFFCO New Zealand Limited	Oppose	<p>The proposed amendment to use of the term “best practicable option” assumes farming activities should be treated as point source discharges. The application “best practicable option” applies largely to the management of point source discharges and PC1 was never geared towards using a wider interpretation of “best practicable option” that is capable of managing diffuse discharges.</p> <p>Notwithstanding the “best practicable option” may not equate to Te Ture Whaimana in 80-years (by 2096), the use of the “best practicable option” by land owners on such a scale (and then the assessment required by WRC on a consent by consent basis) may not be feasible. River Iwi oppose this amendment.</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-3866	Clover Farm Limited	Oppose	<p>The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-9749	Craig, Jeffery	Oppose	<p>The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands.</p> <p>Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1 and the deletion of Policy 16 is opposed. The process to design of PC1 recognised that Rule 3.11.5.7 provides a further barrier for the owners of Multiple owned Maori land and Treaty Settlement land to overcome in order to develop their lands. The River Iwi consider Rule 3.11.5.7 already applies to all land types and deals explicitly with land use change.</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-640	Dunlop, Tania	Oppose	<p>The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-10834	Federated Farmers of New Zealand	Oppose	<p>The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-6455	Gleeson, Graeme B	Oppose	<p>The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.</p>

Table 1

Policy 16 – Flexibility to develop ML and TSL	PC1-5707	Hancock Forest Management (NZ) Ltd	Oppose	<p>The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands.</p> <p>Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. The process to design of PC1 recognised that Rule 3.11.5.7 provides a further barrier for the owners of Multiple owned Maori land and Treaty Settlement land to overcome in order to develop their lands. The River Iwi oppose policy 16 being extended to include all land types (eg, general freehold land).</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-4579	Holmes, Gavin	Oppose	<p>The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands.</p> <p>Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. The process to design of PC1 recognised that Rule 3.11.5.7 provides a further barrier for the owners of Multiple owned Maori land and Treaty Settlement land to overcome in order to develop their lands. The River Iwi oppose policy 16 being extended to include all land types (eg, general freehold land).</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-5893	Huirimu Farms Ltd	Oppose	<p>The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-6834	Jefferis, Daniel	Oppose	<p>The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands.</p> <p>Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. The process to design of PC1 recognised that Rule 3.11.5.7 provides a further barrier for the owners of Multiple owned Maori land and Treaty Settlement land to overcome in order to develop their lands. The River Iwi oppose policy 16 being extended to include all land types (eg, general freehold land).</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-10338	JN & VL Gilbert Family Trust	Oppose	<p>The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-7008	Jodean Farms	Oppose	<p>The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.</p>

Table 1

Policy 16 – Flexibility to develop ML and TSL	PC1-1839	Kilgour, Gareth	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.
Policy 16 – Flexibility to develop ML and TSL	PC1-8829	Miraka Limited	Oppose	The River Iwi consider the development of land should take into account the suitability of that land to sustain a particularly farming system and oppose the deletion of (ii). However, River Iwi also acknowledge that subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process. The deletion of (iii) is opposed by River Iwi as all properties and enterprises need to demonstrate they are reducing contaminant discharges to assist with achieving 10% of the journey to achieve Te Ture Whaimana by 2026 (water quality target set out in Table 3.11-2).
Policy 16 – Flexibility to develop ML and TSL	PC1-4295	Moerangi Trust	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.
Policy 16 – Flexibility to develop ML and TSL	PC1-6811	Muir, Mark	Oppose	The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. The process to design of PC1 recognised that Rule 3.11.5.7 provides a further barrier for the owners of Multiple owned Maori land and Treaty Settlement land to overcome in order to develop their lands. The River Iwi oppose policy 16 being extended to include all land types (eg, general freehold land).
Policy 16 – Flexibility to develop ML and TSL	PC1-2348	North Waikato Federated Farmers	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.
Policy 16 – Flexibility to develop ML and TSL	PC1-6560	Oji Fibre Solutions (NZ) Limited	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by

Table 1

				PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.
Policy 16 – Flexibility to develop ML and TSL	PC1-6599	Pickens and Tanneau, Craig and Julie	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.
Policy 16 – Flexibility to develop ML and TSL	PC1-6295	Pouakani Trust	Oppose	The River Iwi consider the development of land should take into account the suitability of that land to sustain a particularly farming system and oppose the deletion of (ii). However, River Iwi also acknowledge that subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process. The deletion of (iii) is opposed by River Iwi as all properties and enterprises need to demonstrate they are reducing contaminant discharges to assist with achieving 10% of the journey to achieve Te Ture Whaimana by 2026 (water quality target set out in Table 3.11-2).
Policy 16 – Flexibility to develop ML and TSL	PC1-6945	R.P O'Connor and Sons Ltd	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.
Policy 16 – Flexibility to develop ML and TSL	PC1-2512	Rotorua Lakes Council	Oppose	The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana. Policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. The matters listed in Policy 16 (a), (b) and (c) are not a hierarchical list, similar to objectives and policies in the regional plan and the relief sought is opposed.
Policy 16 – Flexibility to develop ML and TSL	PC1-5132	Stark, Steven and Theresa	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.
Policy 16 – Flexibility to develop ML and TSL	PC1-4141	Stokes Shorthorn Farm Ltd	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.

Table 1

Policy 16 – Flexibility to develop ML and TSL	PC1-7473	Tapp, Kevin	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.
Policy 16 – Flexibility to develop ML and TSL	PC1-4409	Te Mata Group Ltd	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.
Policy 16 – Flexibility to develop ML and TSL	PC1-6849	Te Miro Farms Partnership	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.
Policy 16 – Flexibility to develop ML and TSL	PC1-8336	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.
Policy 16 – Flexibility to develop ML and TSL	PC1-7098	Tirohanga Settlers and Sports Association	Oppose	The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. The process to design of PC1 recognised that Rule 3.11.5.7 provides a further barrier for the owners of Multiple owned Maori land and Treaty Settlement land to overcome in order to develop their lands. The River Iwi oppose policy 16 being extended to include all land types (eg, general freehold land).
Policy 16 – Flexibility to develop ML and TSL	PC1-9775	Trinity Lands Ltd	Oppose	The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.
Policy 16 – Flexibility to develop ML and TSL	PC1-3348	Tuakau Proteins Limited	Oppose	The proposed amendment to use of the term “best practicable option” assumes farming activities should be treated as point source discharges. The application “best practicable option” applies largely to the management of point source

Table 1

				<p>discharges and PC1 was never geared towards using a wider interpretation of “best practicable option” that is capable of managing diffuse discharges.</p> <p>Notwithstanding the “best practicable option” may not equate to Te Ture Whaimana in 80-years (by 2096), the use of the “best practicable option” by land owners on such a scale (and then the assessment required by WRC on a consent by consent basis) may not be feasible. River Iwi oppose this amendment.</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-6797	Twining, Murray Ian and Robyn Joy	Oppose	<p>The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands.</p> <p>Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. The process to design of PC1 recognised that Rule 3.11.5.7 provides a further barrier for the owners of Multiple owned Maori land and Treaty Settlement land to overcome in order to develop their lands. The River Iwi oppose policy 16 being extended to include all land types (eg, general freehold land).</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-3837	Verry, Reon and Wendy	Oppose	<p>The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-2704	Waikato Federated Farmers Meat & Fibre Industry Group	Oppose	<p>The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-11355	Wairakei Pastoral Ltd	Oppose	<p>The River Iwi consider that PC1 is an adaptive response to a long-term water quality target (being Te Ture Whaimana) in 2096. The use of best management practice is an appropriate measure of the level of performance that is to expected from any land use development and is not a stand-alone consideration in the framing of Rule 3.11.5.7. Therefore the amendment to replace best management practice is opposed.</p> <p>The River iwi note they support sub-catchment planning and the use of catchment collectives —using catchment based planning— as one mechanism to achieve improved water quality outcomes at a greater scale than might be possible using singular farm environment plans. Sub-catchment based management and catchment collectives need to demonstrate that water quality improvements will occur through the effective and efficient use of resources and implementation of catchment scale mitigation measures.</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-11355	Wairarapa Moana Incorporation	Oppose	<p>The River Iwi consider the development of land should take into account the suitability of that land to sustain a particularly farming system and oppose the deletion of (ii). However, River Iwi also acknowledge that subsequent plan changes will include future management approaches such as the allocation of rights to discharge contaminants (refer to Policy 4). Whether the basis of any new allocation regime is based on natural capital, land resource inventory, land suitability etc will be worked through with the benefit of improved data and information from the implementation of PC1. It is highly likely that</p>

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				<p>new research, including the assimilative capacity of different soil types at different spatial resolutions, will inform this process.</p> <p>The deletion of (iii) is opposed by River Iwi as all properties and enterprises need to demonstrate they are reducing contaminant discharges to assist with achieving 10% of the journey to achieve Te Ture Whaimana by 2026 (water quality target set out in Table 3.11-2).</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-7205	Wellington Farms Ltd	Oppose	<p>The deletion of Policy 16 is opposed by the River Iwi. The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands that are further encumbered by PC1. Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1.</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-4241	Woodacre Partnership	Oppose	<p>The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands.</p> <p>Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. The process to design of PC1 recognised that Rule 3.11.5.7 provides a further barrier for the owners of Multiple owned Maori land and Treaty Settlement land to overcome in order to develop their lands. The River Iwi oppose policy 16 being extended to include all land types (eg, general freehold land).</p>
Policy 16 – Flexibility to develop ML and TSL	PC1-11542	Yule, Don, Lauris and Yvette	Oppose	<p>The River Iwi consider protecting and restoring Tāngata whenua values is a core tenant of achieving Te Ture Whaimana and policy 16 provides a limited pathway for the owners of Multiple owned Maori land and Treaty Settlement land to pursue opportunities for developing their lands.</p> <p>Land returned through Treaty Settlement processes and Maori freehold land should have flexibility to be developed in accordance with the provisions of PC1. The process to design of PC1 recognised that Rule 3.11.5.7 provides a further barrier for the owners of Multiple owned Maori land and Treaty Settlement land to overcome in order to develop their lands. The River Iwi oppose policy 16 being extended to include all land types (eg, general freehold land).</p>

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Policy 17: Considering the wider context of the Vision and Strategy/Te Kaupapa Here 17: Te whakairo ake ki te horopaki whānui o Te Ture Whaimana				
Policy 17 – Considering wider context of Vision and Strategy	PC1-10906	Auckland/Waikato Fish and Game	Support in Part	<p>The River Iwi consider that where possible through the implementation of PC1 — in developing Farm Environment Plans and sub-catchment scale plans— WRC should seek to “achieve co-beneficial outcomes” that are aligned with the wider context of the Vision and Strategy. This includes, but is not limited to, “achieving co-beneficial outcomes” such as habitat restoration, biodiversity enhancement, opportunities to coordinate delivery of services around pest management etc.</p> <p>The River Iwi support amendments to strengthen the intent of Policy 17.</p>

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Policy 17 – Considering wider context of Vision and Strategy	PC1-8028	Black Jack Farms	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipā Rivers) and the National Policy Statement for Freshwater Management 2017. The Vision and the strategy for the Waikato and Waipā Rivers includes matters that fall outside of the limited scope of PC1 that still need to be give effect to by the Regional Plan and Policy 17 ensures there is an avenue to consider these matters through the implementation of PC1 —in developing Farm Environment Plans and sub-catchment scale plans—. The deletion and/or dilution of Policy 17 is opposed by the River Iwi.
Policy 17 – Considering wider context of Vision and Strategy	PC1-7761	Charion Investment Trust	Support in Part	The River Iwi consider that where possible through the implementation of PC1 —in developing Farm Environment Plans and sub-catchment scale plans— WRC should seek to “achieve co-beneficial outcomes” that are aligned with the wider context of the Vision and Strategy. This includes, but is not limited to, “achieving co-beneficial outcomes” such as habitat restoration, biodiversity enhancement, opportunities to coordinate delivery of services around pest management etc. The River Iwi support amendments to strengthen the intent of Policy 17.
Policy 17 – Considering wider context of Vision and Strategy	PC1-10746	Department of Conservation	Support in Part	The River Iwi consider that where possible through the implementation of PC1 —in developing Farm Environment Plans and sub-catchment scale plans— WRC should seek to “achieve co-beneficial outcomes” that are aligned with the wider context of the Vision and Strategy. The River Iwi support the deletion of “secondary benefit” and replacement with “achieving co-beneficial outcomes”.
Policy 17 – Considering wider context of Vision and Strategy	PC-10837	Federated Farmers of New Zealand	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipā Rivers) and the National Policy Statement for Freshwater Management 2017. The Vision and the strategy for the Waikato and Waipā Rivers includes matters that fall outside of the limited scope of PC1 that still need to be give effect to by the Regional Plan and Policy 17 ensures there is an avenue to consider these matters through the implementation of PC1 —in developing Farm Environment Plans and sub-catchment scale plans—. The deletion and/or dilution of Policy 17 is opposed by the River Iwi.
Policy 17 – Considering wider context of Vision and Strategy	PC1-5996	Fletcher Trust	Support in Part	The River Iwi consider that where possible through the implementation of PC1 —in developing Farm Environment Plans and sub-catchment scale plans— WRC should seek to “achieve co-beneficial outcomes” that are aligned with the wider context of the Vision and Strategy. This includes, but is not limited to, “achieving co-beneficial outcomes” such as habitat restoration, biodiversity enhancement, opportunities to coordinate delivery of services around pest management etc. The River Iwi support amendments to strengthen the intent of Policy 17.
Policy 17 – Considering wider context of Vision and Strategy	PC1-10007	Lumbercorp NZ Ltd	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipā Rivers) and the National Policy Statement for Freshwater Management 2017. The Vision and the strategy for the Waikato and Waipā Rivers includes matters that fall outside of the limited scope of PC1 that still need to be give effect to by the Regional Plan and Policy 17 ensures there is an avenue to consider these matters through the implementation of PC1 —in developing Farm Environment Plans and sub-catchment scale plans—. The deletion and/or dilution of Policy 17 is opposed by the River Iwi.
Policy 17 – Considering wider context of Vision and Strategy	PC-3723	New Zealand Steel Ltd	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipā Rivers) and the National Policy Statement for Freshwater Management 2017. The Vision and the strategy for the Waikato and Waipā Rivers includes matters that fall outside of the limited scope of PC1 that still need to be give effect to by the Regional Plan and Policy 17 ensures there is an avenue to consider these matters through the implementation of PC1 —in developing Farm Environment Plans and sub-catchment scale plans—. The deletion and/or dilution of Policy 17 is opposed by the River Iwi.

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Policy 17 – Considering wider context of Vision and Strategy	PC-3070	North Waikato Federated Farmers	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipā Rivers) and the National Policy Statement for Freshwater Management 2017. The Vision and the strategy for the Waikato and Waipā Rivers includes matters that fall outside of the limited scope of PC1 that still need to be give effect to by the Regional Plan and Policy 17 ensures there is an avenue to consider these matters through the implementation of PC1 —in developing Farm Environment Plans and sub-catchment scale plans—. The deletion and/or dilution of Policy 17 is opposed by the River Iwi.
Policy 17 – Considering wider context of Vision and Strategy	PC-6562	Oji Fibre Solutions (NZ) Limited	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipā Rivers) and the National Policy Statement for Freshwater Management 2017. The Vision and the strategy for the Waikato and Waipā Rivers includes matters that fall outside of the limited scope of PC1 that still need to be give effect to by the Regional Plan and Policy 17 ensures there is an avenue to consider these matters through the implementation of PC1 —in developing Farm Environment Plans and sub-catchment scale plans—. The deletion and/or dilution of Policy 17 is opposed by the River Iwi.
Policy 17 – Considering wider context of Vision and Strategy	PC-5148	Stark, Steven and Theresa	Oppose	PC1 is required to give effect to Te Ture Whaimana (the Vision and Strategy for the Waikato and Waipā Rivers) and the National Policy Statement for Freshwater Management 2017. The Vision and the strategy for the Waikato and Waipā Rivers includes matters that fall outside of the limited scope of PC1 that still need to be give effect to by the Regional Plan and Policy 17 ensures there is an avenue to consider these matters through the implementation of PC1 —in developing Farm Environment Plans and sub-catchment scale plans—. The deletion and/or dilution of Policy 17 is opposed by the River Iwi.
Policy 17 – Considering wider context of Vision and Strategy	PC1-1273	Verkerk, Gwyneth	Support in Part	The River Iwi consider that where possible through the implementation of PC1 —in developing Farm Environment Plans and sub-catchment scale plans— WRC should seek to “achieve co-beneficial outcomes” that are aligned with the wider context of the Vision and Strategy. This includes, but is not limited to, “achieving co-beneficial outcomes” such as habitat restoration, biodiversity enhancement, opportunities to coordinate delivery of services around pest management etc. The River Iwi support amendments to strengthen the intent of Policy 17.

Table 1

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Schedule 1				
Schedule 1	PC1-7105	Ballance Agri-Nutrients Limited	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The proposed amendments to Schedule 1 clarify mitigation actions need to be put in place and implemented to reduce the four contaminants. The River Iwi support the need for national consistency on farming related definitions, potentially including the use of the 'Good Management Practices' document. However, consideration and allowance need to be provided to permit the inclusion of new technologies and practices.
Schedule 1	PC1-11508	Beef + Lamb New Zealand Limited	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The proposed amendments to Schedule 1 clarify mitigation actions which need to be put in place and implemented to reduce the four contaminants. The River Iwi support the need for national consistency on farming related definitions. However, consideration and allowance need to be provided to permit the inclusion of new technologies and practices. In addition, the River Iwi support the inclusion of sub-catchment specific information related to mitigation and water quality issues, that will allow land owners to understand those areas that need to be prioritised. The River Iwi would like to understand Beef + Lamb NZ point regarding the sustainable Nitrogen discharge level and how this differs to the NRP or 75th percentile.
	PC1-3203	Carey, Rita Anne	Support in Part	The River Iwi consider the use of Farm Environment Plans are a robust tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. However, as identified by this submission there is the need to ensure there is the appropriate experience with advisors that can help farmers. All plans require certified advisors to assist, but the River Iwi would like consideration given to the capacity within the industry to provide these advisors. This is especially so given the range of experiences needed. Consideration should be given to managing industry capacity on a national scale.
Schedule 1	PC1-10255	DairyNZ	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the need for national consistency on farming related definitions. However, consideration and allowance need to be provided to permit the inclusion of new technologies and practices. The River Iwi support having setback distances imposed.
Schedule 1	PC1-10647	Department of Conservation	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The proposed amendments to Schedule 1 clarify mitigation actions need to be put in place and implemented to reduce the four contaminants. The River Iwi support the notion for setback distances to be used, however the specific distances require further discussion. The River Iwi support the notion that only that information that is necessary for Schedule 1 should be made available to WRC and likewise Schedule 1 should align with the policies, methods, definitions, etc. to which it relates. The River Iwi support the inclusion of subcatchment specific information related to mitigation and water

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				quality issues that will allow land owners to understand those areas that need to be prioritised and specific action that can be taken.
Schedule 1	PC1-5056	Farm Environment Trust (Waikato)	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi understand that WRC are using the NRP as a short-term measure but would like the opportunity to discuss an approach that looks at the long-term and avoids the use of 'grandparenting' or setting a fixed reference point altogether. The River Iwi support the use of the 'current' version of Overseer including the 'current' data input standards that allows for updates to occur and not have land owners penalised for having a change in NRP.
Schedule 1	PC1-10429	Farmers 4 Positive Change (F4PC)	Support in Part	Amendments proposed to delete Schedule 1 are opposed by the River Iwi. Use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. Identifying these areas on each farm will then assist with creating a subcatchment based approach to mitigation. Additionally, identifying relevant mitigation options and actions that can be taken by the land owner should be made available, be clear and concise by WRC. The River Iwi support the inclusion of subcatchment specific information related to mitigation and water quality issues that will allow land owners to understand those areas that need to be prioritised and specific action that can be taken.
Schedule 1	PC1-10854	Federated Farmers of New Zealand	Support	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the notion that only that information that is necessary for Schedule 1 should be made available to WRC and likewise Schedule 1 should align with the policies, methods, definitions, etc. to which it relates.
Schedule 1	PC1-10650	Fertiliser Association of New Zealand	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the notion that only that information that is necessary for Schedule 1 should be made available to WRC and likewise Schedule 1 should align with the policies, methods, definitions, etc. to which it relates. The River Iwi support the need for national consistency on farming related definitions, including best practicable options and good management practice. However, consideration and allowance need to be provided to permit the inclusion of new technologies and practices if these definitions are to be used.
Schedule 1	PC1-10559	Fonterra Co-operative Group Ltd	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the notion that all inputs, including irrigation and wastewater irrigation should be considered when completing a FEP. The River Iwi oppose amending the 5-year rolling average to 3 years as this reduces the effect of showing seasonal variation. The River Iwi support the added clarity around consistency of input data used.
Schedule 1	PC1-7932	Hill Country Farmers Group	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the notion that wording and common terms need to be clear and used consistently to avoid confusion.

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Schedule 1	PC1-10215	Horticulture New Zealand (HortNZ)	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the notion that only that information that is necessary for Schedule 1 should be made available to WRC and likewise Schedule 1 should align with the policies, methods, definitions, etc. to which it relates. The River Iwi support the acknowledgement of different land uses and their impact to land and water and the need for these different land users to have a specific FEP that reflect land management. The River Iwi would like to be considered for any further consultation regarding additions to Schedule 1.
Schedule 1	PC1-3689	Matamata-Piako District Council	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the notion that only that information that is necessary for Schedule 1 should be made available to WRC and likewise Schedule 1 should align with the policies, methods, definitions, etc. to which it relates.
Schedule 1	PC1-8898	Miraka Limited	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The proposed amendments to Schedule 1 clarify mitigation actions which need to be put in place and implemented to reduce the four contaminants. The River Iwi support the need for national consistency on farming related definitions. However, consideration and allowance need to be provided to permit the inclusion of new technologies and practices when relating to using best practicable option or good/best management practice.
Schedule 1	PC1-7991	New Zealand Association of Resource Management	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the submission that a Certified Farm Environment Planners should have the relevant training to undertake and understand farm mapping systems
Schedule 1	PC1-1676	New Zealand Grain and Seed Trade Association	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The proposed amendments to Schedule 1 clarify mitigation actions need to be put in place and implemented to reduce the four contaminants. The River Iwi support the notion to fence waterways up to a slope of 15 degrees, beyond this, other mitigation measures should be put in place as fencing can become impractical.
Schedule 1	PC1-4648	New Zealand Pork Industry Board	Support	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants.
Schedule 1	PC1-2351	North Waikato Federated Farmers	Neither Support or Oppose	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi would like to understand further, North Waikato Federated Farmers submission and how this relates to Schedule 1 and why there should be a decision making process that does not follow a standard resource consenting process.
Schedule 1	PC1-6276	Paihere Farms Group	Support in Part	The River Iwi consider the use of Farm Environment Plans are a robust tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four

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				contaminants. However, as identified by this submission there is the need to ensure there is the appropriate experience with advisors that can help farmers. All plans require certified advisors to assist, but the River Iwi would like consideration given to the capacity within the industry to provide these advisors. This is especially so given the range of experiences needed. Consideration should be given to managing industry capacity on a national scale.
Schedule 1	PC1-10174	Ravensdown Limited	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the need for national consistency on farming related definitions. However, consideration and allowance need to be provided to permit the inclusion of new technologies and practices when relating to using best practicable option or good management practice.
Schedule 1	PC1-4171	South Waikato District Council	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the notion that only that information that is necessary for Schedule 1 should be made available to WRC. The River Iwi support the inclusion of subcatchment specific information related to mitigation and water quality issues that will allow land owners to understand those areas that need to be prioritised and specific action that can be taken.
Schedule 1	PC1-2763	Spectrum Dairies Limited Partnership	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. As part of the FEP, an annual N loss (NRP) is established. WRC have stated that they will not grandparent these NRPs. However, the scheme of establishing a NRP is still seen as a form of 'grandparenting'. The River Iwi understand that WRC are using this as a short-term measure but would like the opportunity to discuss an approach that looks at the long-term and avoids the use of 'grandparenting' altogether. The River Iwi support land use change to reduce contaminant loading in sensitive areas but to also provide flexibility to achieve an economic and environmental benefit.
Schedule 1	PC1-9343	Taupo Lake Care Incorporated	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi believe that the use of Overseer to measure nitrogen at this stage will allow for a base nitrogen target to be formed. However, WRC state that other contaminants (phosphorus, sediment and E. coli) should be mitigated and yet these are not shown to be measured, only mitigated. The River Iwi believe that further work is required in this area and would like to be involved in further discussions to account for the measurement of all four contaminants.
Schedule 1	PC1-2209	Te Aroha Federated Farmers	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. As part of the FEP, an annual N loss (NRP) is established. WRC have stated that they will not grandparent these NRPs. However, the scheme of establishing a NRP is still seen as a form of 'grandparenting'. The River Iwi understand that WRC are using this as a short-term measure but would like the opportunity to discuss an approach that looks at the long-term and avoids the use of 'grandparenting' altogether.
Schedule 1	PC1-8917	Te Paiaka Lands Trust	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the submission that Certified Farm Environment Planners (Certified Nutrient

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				Management Advisors) should have the relevant training to undertake and understand farm mapping systems. Additionally, the River Iwi and other land owners should be reassured that the staff at WRC are suitably qualified and have the experience to understand nutrient budgeting, FEPs and mitigation options.
Schedule 1	PC1-10494	TerraCare Fertilisers Limited	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the submission that Certified Farm Environment Planners (Certified Nutrient Management Advisors) should have the relevant training to undertake and understand nutrient advice. Additionally, the River Iwi and other land owners should be reassured that the staff at WRC are suitably qualified and have the experience to understand nutrient budgeting, FEPs and mitigation options.
Schedule 1	PC1-8201	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The proposed amendments to Schedule 1 clarify mitigation actions need to be put in place and implemented to reduce the four contaminants. The River Iwi support the notion that only that information that is necessary for Schedule 1 should be made available to WRC. The River Iwi support the inclusion of subcatchment specific information related to mitigation and water quality issues that will allow land owners to understand those areas that need to be prioritised and specific action that can be taken.
Schedule 1	PC1-4123	Tiroa E Trust	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the submission that Certified Farm Environment Planners (Certified Nutrient Management Advisors) should have the relevant training to undertake and understand what is required to complete a FEP. Additionally, the River Iwi and other land owners should be reassured that the staff at WRC are suitably qualified and have the experience to understand nutrient budgeting, FEPs and mitigation options.
Schedule 1	PC1-2803	Tucker, Geoff and Kara	Oppose in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support using Certified Farm Environment Planners (Certified Nutrient Management Advisors) that have relevant training to undertake and understand what is required to complete a FEP. Additionally, the River Iwi and other land owners should be reassured that the staff at WRC are suitably qualified and have the experience to understand nutrient budgeting, FEPs and mitigation options. River Iwi believe if stocking rate is to be used as a measure, this should be well below the stated 18 SU/ha as this is considered a stocking rate more aligned with intensive farming systems.
Schedule 1	PC1-4380	Upper Maire Creek Sub Catchment	Oppose in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support using Certified Farm Environment Planners (Certified Nutrient Management Advisors) that have relevant training to undertake and understand what is required to complete a FEP. Additionally, the River Iwi and other land owners should be reassured that the staff at WRC are suitably qualified and have the experience to understand nutrient budgeting, FEPs and mitigation options. River Iwi oppose the use of a stocking rate to determine if a property should undertake a FEP.

Table 1

Schedule 1	PC1-9602	Waikato and Waipā Branches of the New Zealand Deer Farmers Association	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the notion that Schedule 1 should align with the policies, methods, definitions, etc. to which it relates. River Iwi would support being involved in discussions to determine an appropriate method to estimate slope.
Schedule 1	PC1-3122	Waikato District Council (WDC)	Support	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the notion that Schedule 1 should align with the policies, methods, definitions, etc. to which it relates.
Schedule 1	PC1-2678	Waikato Federated Farmers Meat & Fibre Industry Group	Oppose	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. As part of the FEP, an annual N loss (NRP) is established. WRC have stated that they will not grandparent these NRPs. However, the scheme of establishing a NRP is still seen as a form of 'grandparenting'. The River Iwi understand that WRC are using this as a short term measure but would like the opportunity to discuss an approach that looks at the long-term and avoids the use of 'grandparenting' altogether. River Iwi oppose the deletion of Clause 5, but would support an amendment to this clause to avoid grandparenting.
Schedule 1	PC1-5523	Waikato Focus on Peat Group	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The proposed amendments to Schedule 1 clarify mitigation actions need to be put in place and implemented to reduce the four contaminants. The River Iwi support the notion for setback distances to be used, however the specific distances require further discussion. The River Iwi support the inclusion of sub-catchment specific information related to mitigation and water quality issues that will allow land owners to understand those areas that need to be prioritised and specific action that can be taken.
Schedule 1	PC1-31	Waikato Groundspread Association	Support	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the need for national consistency on farming related definitions and practices. River Iwi support the requirements of all fertiliser and nutrients applied to farms within the catchment of the PPC1 should be applied in a manner that meets the requirements of the Fertiliser Code of Practice – Fertmark Spreadmark and be supported by the use of technology that capture the areas that fertiliser and nutrients are applied to (Proof of Placement).
Schedule 1	PC1-3575	Waikato Regional Council	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi wish to be a part of any discussion whereby there are amendments made to Schedule 1.
Schedule 1	PC1-11563	Waikato River Authority	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi believe that the use of Overseer to measure nitrogen at this stage will allow for a base nitrogen target to be formed. However, WRC state that other contaminants (phosphorus, sediment and E. coli) should be mitigated

Table 1

				and yet these are not shown to be measured, only mitigated. The River Iwi believe that WRC could do more work in this regard and would like to be involved in further discussions to account for the measurement of all four contaminants.
Schedule 1	PC1-3243	Waipā District Council	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the notion that wording and common terms need to be clear and used consistently to avoid confusion. The River Iwi support the inclusion of sub-catchment specific information related to mitigation and water quality issues that will allow land owners to understand those areas that need to be prioritised and specific action that can be taken.
Schedule 1	PC1-11389	Wairakei Pastoral Ltd	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the use of the 'current' version of Overseer including the 'current' data input standards. River Iwi support the requirement for a review of FEPs.
Schedule 1	PC1-2148	Wairarapa Moana Incorporation	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The proposed amendments to Schedule 1 clarify mitigation actions need to be put in place and implemented to reduce the four contaminants. The River Iwi support the need for national consistency on farming related definitions. However, consideration and allowance need to be provided to permit the inclusion of new technologies and practices when relating to using best practicable option or good/best management practice. The River Iwi support the inclusion of sub-catchment specific information related to mitigation and water quality issues that will allow land owners to understand those areas that need to be prioritised and specific action that can be taken.
Schedule 1	PC1-7943	Waitomo Catchment Trust Board	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. River Iwi would like to be involved in further discussions relating to the reference period for calculating NRPs. River Iwi support the notion of FEPs being free or subsidised.
Schedule 1	PC1-10856	Waitomo District Council	Support in Part	The River Iwi consider the use of Farm Environment Plans is the best available tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. The River Iwi support the notion that wording and common terms need to be clear and used consistently to avoid confusion.
Schedule 1	PC1-8550	Williams, Annette Judith	Support in Part	The River Iwi consider the use of Farm Environment Plans are a robust tool to engage with land owners to reinforce the need to identify critical source areas and design customised mitigation actions to reduce the diffuse discharge of the four contaminants. However, as identified by this submission there is the need to ensure there is the appropriate experience with advisors that can help farmers. All plans require certified advisors to assist, but the River Iwi would like consideration given to the capacity within the industry to provide these advisors. This is especially so given the range of experiences needed. Consideration should be given to managing industry capacity on a national scale.

Table 1

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Schedule A				
Schedule A	PC1-6223	Ata Rangi 2015 Limited Partnership	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>Amendments that are agreed through the hearings phase to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC1-6915	Balance Agri-Nutrients	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>The definition of individual urban properties is not required at this time. While PC1 targets the management of the discharge of the four contaminants from properties above 4ha in size, properties less than 2ha and urban areas must do their part in assisting to achieve Te Ture Whaimana. The River Iwi support more stringent controls —on the four contaminants— being placed on point source discharges for storm water and waste water that is discharged from urban areas when resource consents are renewed. New resource consents for the discharge of the our contaminants from urban areas must demonstrate they will assist to achieve Te Ture Whaimana in 80-years (by 2096).</p> <p>Amendments to strengthen Schedule A are supported by the River Iwi. This includes refining how information should be collected and stored.</p>
Schedule A	PC1-8052	Black Jack Farms	Oppose	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments. All properties greater then 2ha should be registered, noting that properties less than 2ha and urban areas must also do their part to achieve Te Ture Whaimana in 80-years (by 2096)</p> <p>Amendments that are agreed through the hearings phase to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC1-11060	Department of Conservation	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments. Sufficient time is required data to be supplied to WRC and this process should not be rushed, nor should it be delayed.</p> <p>Amendments to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC1-10847	Federated Farmers of New Zealand	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments. WRC need to take all precautions to ensure private data is protected.</p> <p>Amendments that are agreed through the hearings phase to strengthen Schedule A are supported by the River Iwi. This includes clarity between Schedules, rules, policies, definitions etc</p>

Table 1

Schedule A	PC1-10637	Fertiliser Association of New Zealand	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>The definition of individual urban properties is not required at this time. While PC1 targets the management of the discharge of the four contaminants from properties above 4ha in size, properties less than 2ha and urban areas must do their part in assisting to achieve Te Ture Whaimana. The River Iwi support more stringent controls —on the four contaminants— being placed on point source discharges for storm water and waste water that is discharged from urban areas when resource consents are renewed. New resource consents for the discharge of the our contaminants from urban areas must demonstrate they will assist to achieve Te Ture Whaimana in 80-years (by 2096).</p> <p>Amendments to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC1-3280	Genetic Technologies Ltd	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments. Sufficient time is required data to be supplied to WRC and this process should not be rushed, nor should it be delayed.</p> <p>Amendments to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC1-5785	Hancock Forest Management (NZ) Ltd	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater then 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments. Amendments to exclude forestry are opposed by River Iwi as this would likely miss a number of properties and provide a skewed picture of land use within the catchment. Further, forestry is imbedded in some mixed enterprises and it would be difficult to determine the scale/portion that allows forestry to be excluded.</p> <p>The River Iwi would support amendments to clarify Schedule A so that the level of information provided to WRC translate into improved management decisions post 2026.</p>
Schedule A	PC1-7899	Hill Country Farmers Group	Oppose	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater then 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>Amendments proposed to delete sections of Schedule A that would provide valuable information to inform future decision-making are opposed by the River Iwi.</p>
Schedule A	PC-5913	Huirimu Farms Ltd	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater then 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>There are tangible benefits from specifying reporting dates for stocking rate (eg, seasonally, quarterly) and this should be investigated. There should be a consistent approach used that allows quantification of stock numbers either on an annual average basis (ie monthly reconciliation numbers) or a seasonal point in time (i.e. stock wintered as of 1 July). Amendments to strengthen Schedule A are supported by the River Iwi.</p>

Table 1

Schedule A	PC1-1917	Kilgour, Gareth	Oppose	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater than 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments. Amendments proposed to increase the minimum threshold size set out in Schedule A are opposed by the River Iwi.</p> <p>The deletion of the requirement to provide information on request of WRC is opposed by River Iwi.</p>
Schedule A	PC-8782	Leigh Family	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater than 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>The proposed amendment to only record the stocking rates at 30 June may, in some situations, be counterproductive to achieving the 2026 short term freshwater objective as there are a multitude of enterprise practices, including those that winter off stock. However, if there are tangible benefits from specifying multiple reporting dates for stocking rate (eg, annually, seasonally, quarterly) then this should be investigated. Amendments to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC-8782	Liefting, John	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater than 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>The proposed amendment to record the maximum intended stocking rates may, in some situations, be counterproductive to achieving the 2026 short term freshwater objective. However, if there are tangible benefits from specifying the maximum intended stocking rate —as opposed to current stocking rate— then this should be investigated. Potentially, consideration could be given to an annual average stocking rate. Amendments to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC1-3670	Matamata-Piako District Council	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater than 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments. Amendments to increase the minimum 2ha threshold to 10ha is opposed by the River Iwi, as increasing the threshold to 10ha would likely miss a high number of properties and provide a skewed picture of land use within the catchment.</p> <p>The River Iwi would support amendments to clarify Schedule A so that the level of information provide to WRC translate into improved management decisions post 2026.</p>
Schedule A	PC1-8323	McGovern, Annette	Oppose	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater than 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments. Amendments proposed to increase the minimum threshold size set out in Schedule A are opposed by the River Iwi.</p> <p>The deletion of the requirement to provide information on request of WRC is opposed by River Iwi.</p>
Schedule A	PC1-4838	NZ Transport Agency	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p>

Table 1

				<p>The definition of individual ‘urban properties’ may not be required at this time. PC1 is designed to manage the discharge of the four contaminants from properties above 4ha in size. However, River Iwi recognise that urban areas must do their part in assisting to achieve Te Ture Whaimana by 2096. The River Iwi support more stringent controls —on the four contaminants— being placed on point source discharges for stormwater and wastewater that is discharged from urban areas when resource consents are renewed.</p> <p>Amendments to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC1-8740	Oji Fibre Solutions (NZ) Limited	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments. WRC need to take all precautions to ensure private data is protected.</p> <p>Amendments that are agreed through the hearings phase to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC1-5887	Schuler Brothers Ltd	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>The definition of individual urban properties is not required at this time. While PC1 targets the management of the discharge of the four contaminants from properties above 4ha in size, properties less than 2ha and urban areas must do their part in assisting to achieve Te Ture Whaimana. The River Iwi support more stringent controls —on the four contaminants— being placed on point source discharges for storm water and waste water that is discharged from urban areas when resource consents are renewed. New resource consents for the discharge of the our contaminants from urban areas must demonstrate they will assist to achieve Te Ture Whaimana in 80-years (by 2096).</p> <p>Amendments to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC1-5476	Sieling Farms	Oppose	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater then 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments. Increasing the threshold to 10ha would likely miss a high number of properties and provide a skewed picture of land use within the catchment.</p> <p>Amendments to strengthen Schedule A through gathering data on other matters including maps of linked properties (enterprises) and confirming the location of waterbodies, are supported by the River Iwi</p>
Schedule A	PC1-4115	South Waikato District Council	Oppose	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater then 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments. Increasing the threshold to 10ha would likely miss a high number of properties and provide a skewed picture of land use within the catchment.</p> <p>Amendments to strengthen Schedule A through gathering data on other matters including maps of linked properties (enterprises) and confirming the location of waterbodies, are supported by the River Iwi</p>
Schedule A	PC1-7615	Tamahere Community Committee	Oppose	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater then 2ha— will be a cornerstone of improving the management of land use</p>

Table 1

				<p>within the Waikato and Waipā River catchments. Increasing the threshold to 6ha would likely miss a high number of properties and provide a skewed picture of land use within the catchment.</p> <p>Amendments to strengthen Schedule A through gathering data on other matters including maps of linked properties (enterprises) and confirming the location of waterbodies, are supported by the River Iwi</p>
Schedule A	PC1-5794	Treweek, Glen	Oppose	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater than 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments. Increasing the threshold to 10ha would likely miss a high number of properties and provide a skewed picture of land use within the catchment.</p> <p>Amendments to change the date for when properties must be registered to 24-months prior to PC1 becoming operative are not supported. It is impossible to know when PC1 will become operative and therefore impossible to determine when the 24-month period should start.</p>
Schedule A	PC1-4369	Upper Maire Creek Sub Catchment	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>Stocking rate is required to obtain the right level of data to make future management decisions and should be retained.</p> <p>Amendments that are agreed through the hearings phase to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC1-3943	Verry, Reon and Wedny	Oppose	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater than 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>Amendments proposed to delete Schedule A are opposed by the River Iwi.</p>
Schedule A	PC1-179	Waikato Regional Council	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A —for properties greater than 2ha— will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>It is unclear why WRC want to increase the size threshold from 2ha to 4.1 ha. While the regulatory framework is predicated on a 4.0 hectare threshold, Schedule A is concerned with gathering data from the use of land within the Waikato and Waipā river catchments to assist with future management decisions. At this time, WRC does not have spatial data with enough detail to form a judgement as to whether 2ha properties (that are not urban) within the Waikato and Waipā river catchments are having a cumulative adverse effect on water quality through the discharge of the four contaminants. Schedule A is not an unreasonable imposition on property owners and the data is required to ensure future management decisions are properly informed.</p> <p>Amendments that are agreed through the hearings phase to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC1-3225	Waipa District Council	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>Amendments that are agreed through the hearings phase to strengthen Schedule A are supported by the River Iwi.</p>

Table 1

Schedule A	PC1-10337	Waitomo District Council	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>Amendments that are agreed through the hearings phase to strengthen Schedule A are supported by the River Iwi.</p>
Schedule A	PC1-9057	Win Dee Farms (2007) Ltd	Support in Part	<p>The River Iwi support the requirement for registration information as set out in Schedule A. The information received by the WRC from Schedule A will be a cornerstone of improving the management of land use within the Waikato and Waipā River catchments.</p> <p>Amendments that are agreed through the hearings phase to strengthen Schedule A are supported by the River Iwi.</p>

Table 1

PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Schedule B				
Schedule B	PC1-11021	Auckland/Waikato Fish and Game	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipā River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. In addition, River Iwi recognise that it is essential NRP are updated for all properties within a catchment when modelling software is updated, and this requires base files to be maintained.
Schedule B	PC1-9143	Auckland Council	Neither Support or Oppose	
Schedule B	PC1-6570	Ballance Agri-Nutrients Limited	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipā River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. River Iwi consider that timing is important when a NRP should be completed and likewise the years that should be considered for assessment. More time may need to be given to provide the NRP data as the 'on-ground' resources may not be available. While it is noted that most dairy farms will have undertaken a nutrient budget, there are specific requirements here that need to be considered. Further, some records that are required may not exist; and this will be an issue when needing to verify the accuracy of nutrient assessment.
Schedule B	PC1-8130	Ballantine, Alan Maurice	Support in Part	The River Iwi agree with the submitter's view that Overseer should be used to guide farming practice rather than regulate.
Schedule B	PC1-11506	Beef and Lamb	Support in Part	The River Iwi support the submission in part. Particularly, the River Iwi agree that the 'Best Practice Input Data' for Overseer modelling should be used. This includes ensuring that the input standards in table 1 are consistent with the Best practice Input Data. There also needs to be clarification surrounding the title, scope and areas of expertise of Certified Farm Nutrient Advisors. Importantly there should be consistency across New Zealand as this is seen by the River Iwi as a means of securing the necessary resourcing to allow the capacity to complete the extent of work within a short time period. The River Iwi also believe soil and further farm resource data is supplied to ensure blocks are appropriately established in Overseer.
Schedule B	73409	Bennett, Martin	Support in Part	The River Iwi support in part the submission, particularly the concept of acknowledging past contributions of farmers that are early adopters and have already acted to mitigate nutrient discharges.
Schedule B	PC1-8543	Carter, Shaun Colin Thomas	Support in Part	Amendments proposed to delete Schedule B are opposed by the River Iwi. The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. River Iwi consider that timing is important when a NRP should be completed and likewise the years that should be considered for assessment.
Schedule B	PC1-8471	Clarke, Hamish	Support in Part	The River Iwi support in Part the submission, particularly the retention of the NRP. However, the River Iwi oppose the removal of the 75th percentile but would be willing to consider other statistical thresholds that help with the overall objectives. The River Iwi do not see it as appropriate to link sediment nutrient loss to Olsen P results. The River Iwi support

Table 1

				the need to provide a definition of stock units and stocking rate in the Glossary; particularly if there is the opportunity to use actual live weights. This definition should be an industry standard.
Schedule B	PC1-4134	Dairy Goat Co-Operative (N.Z) Ltd	Oppose	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. Using a model approved by the CE of WRC, an estimated NRP should be used.
Schedule B	PC1-10254	DairyNZ	Support	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. In addition, River Iwi recognise that it is essential NRP are updated for all properties within a catchment when modelling software is updated. Additionally, wording needs to be amended to allow for software version updates.
Schedule B	PC1-11065	Department of Conservation	Support	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments.
Schedule B	PC1-10850	Federated Farmers of New Zealand	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. The River Iwi support the notion that wording and common terms need to be clear and used consistently (nationally) to avoid confusion. Terms should also align with National Policy.
Schedule B	PC1-10642	Fertiliser Association of New Zealand	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. Logistically, creating a base NRP over more than 1 or 2 years may not be acceptable at this time. Establishing a max value, then considering rolling averages thereafter once more data can be accumulated would be more acceptable. River Iwi support the need to obtain a max value for a base NRP that should reflect the current practice on-farm; and ideally this should be over 5 years to reflect seasonal variations.
Schedule B	PC1-10517	Fonterra Co-operative Group Ltd	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. In addition, River Iwi recognise that it is essential NRP are updated for all properties within a catchment when modelling software is updated.
Schedule B	PC1-10645	Fonterra Shareholders Council	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. In addition, River Iwi recognise that it is essential NRP are updated for all properties within a catchment when modelling software is updated. But importantly, as noted by this submission is the need to develop an efficient method for updating individual farm models without burdening individual farms with additional costs.

Table 1

Schedule B	PC1-7526	Greenlea Premier Meats Ltd	Support in Part	The River Iwi support in part the submissions point of farming flexibility below 20 kg N/ha/yr. The River Iwi realise that there is a need to streamline nutrient managements for low nutrient loss properties, especially as details records enabling accurate predictions may not be readily available, leading to inaccuracies in the modelling. The River Iwi also note that for low intensive farms the issue of contaminant management is more around phosphorus and sediment, of which there are limitations when applying the NRP approach.
Schedule B	PC1-7903	Hill Country Farmers Group	Support in Part	Amendments proposed to delete Schedule B are opposed by the River Iwi. The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. More information is required as to why financial records would be needed by WRC.
Schedule B	PC1-825	Juno, Anne and Allen	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. In addition, River Iwi recognise that the use of on-farm monitoring data would be of great assistance in identifying nitrogen levels in waterways, however this is likely to be at a great cost financially and the affordability should be considered.
Schedule B	PC1-1919	Kilgour, Gareth	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. Assessing those years that are most relevant to the farming system will be essential at developing a NRP that is reflective of the farming system.
Schedule B	PC1-9364	Maniapoto Māori Trust Board	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. Establishing a max value, then considering rolling averages thereafter once more data can be accumulated would be more acceptable. River Iwi support the need to obtain a max value for a base NRP that should reflect the current practice on-farm.
Schedule B	PC1-11766	Maungatautari Marae	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. Establishing a max value, then considering rolling averages thereafter once more data can be accumulated would be more acceptable. River Iwi support the need to obtain a max value for a base NRP that should reflect the current practice on-farm.
Schedule B	PC1-320	Miller, Alexander Dane	Oppose	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. The use of Natural Capital or other systems does not focus on water quality. The River Iwi support the use of tools that are supportive of investigating water quality.
Schedule B	PC1-8758	Nelson Farms Partnership	Oppose	Amendments proposed to delete Schedule B are opposed by the River Iwi. The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. On-farm assessments need to be conducted to highlight the areas that can then be targeted within a subcatchment before a subcatchment approach can be undertaken.

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Schedule B	PC1-4647	New Zealand Pork Industry Board	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. The River Iwi support the input of accurate weight data into Overseer or similar modelling tool.
Schedule B	PC1-11614	Ngaati Tamaoho Trust Te Taiao Roopuu	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed.
Schedule B	PC1-11865	Ngati Haua Iwi Trust	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed.
Schedule B	PC1-517	Nichol, Peter	Oppose	Amendments proposed to delete Schedule B are opposed by the River Iwi. The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments
Schedule B	PC1-3384	Nicholas, Michael George, Raewyn Joan and Jonathon George	Oppose	Amendments proposed to delete Schedule B are opposed by the River Iwi. The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments
Schedule B	PC1-2285	North Waikato Federated Farmers	Oppose	Amendments proposed to delete Schedule B are opposed by the River Iwi. The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments
Schedule B	PC1-5418	Open Country Dairy	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. River Iwi support increasing the reference period from two years to establish a more robust NRP. The River Iwi support re considering the season used for the NRP.
Schedule B	PC1-6267	Paihere Farms Group	Oppose	Amendments proposed to delete Schedule B are opposed by the River Iwi. The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments
Schedule B	PC1-10165	Ravensdown Limited	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. In addition, River Iwi recognise that it is essential NRP are updated for all properties within a catchment when modelling software is updated. Additionally, wording needs to be amended to reflect the correct terminology of a Certified Nutrient Management Advisor. River Iwi also support the extended reference period to adopt a NRP.
Schedule B	PC1-8451	The Royal Forest and Bird Protection Society	Oppose in part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to

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		of New Zealand Incorporated		ensure nitrogen reference points reflect the individual farms that are being assessed. Logistically, creating a base NRP over more than 1 or 2 years may not be acceptable at this time given seasonal variations. Establishing a max value, then considering rolling averages thereafter once more data can be accumulated would be more acceptable. River Iwi support the need to obtain a max value for a base NRP that should reflect the current practice on-farm.
Schedule B	PC1-11269	Waikato Dairy Leaders Group	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed.
Schedule B	PC1-3119	Waikato District Council (WDC)	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. The River Iwi understand that WRC are using the NRP as a short-term measure but would like the opportunity to discuss an approach to how the NRP can be used as a long-term measure. The River Iwi support the use of the 'current' version of Overseer including the 'current' data input standards.
Schedule B	PC1-2682	Waikato Federated Farmers Meat & Fibre Industry Group	Oppose	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. The River Iwi understand that some properties may not have all relevant data and a default will need to be used. Some form of uniformity will be required to avoid data being overly skewed.
Schedule B	PC1-3553	Waikato Regional Council	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. The River Iwi support the notion of a NRP representing the specific location that it has been calculated for. The River Iwi understand that if an enterprise moves to a different location, the NRP previously calculated for the initial location will not reflect that of the new location due to input differences such as soil type and climate. The River Iwi support the notion that wording and common terms need to be clear and used consistently to avoid confusion. Terms should also align with National Policy. The River Iwi support the notion that only that information that is necessary for Schedule B should be made available to WRC and likewise Schedule B should align with the policies, methods, definitions, etc. to which it relates.
Schedule B	PC1-11384	Wairakei Pastoral Ltd	Support in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land uses within the Waikato and Waipa River Catchments. The River Iwi support the use of the 'current' version of Overseer including the 'current' data input standards.
Schedule B	PC1-7947	Waitomo Catchment Trust Board	Oppose in Part	The River Iwi consider the nitrogen reference point is a useful tool to assist the WRC to reconcile the quantum of nitrogen that is discharged by land users within the Waikato and Waipa River Catchments. Data input standards need to be accurate to ensure nitrogen reference points reflect the individual farms that are being assessed. River Iwi understand that logistically creating a base NRP using 5 years of data may not be feasible, however the reference dates and data need to be discussed further and River Iwi would like to be involved in these discussions.

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PC1 section	Sub ID	Sub name	Support/Oppose	Reasons for Further Submission
Schedule C				
Schedule C	PC1-9140	Auckland Council	Oppose	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. However, excluding sheep and goats at this time is not necessary as these species do not generally gather in waterways and cause concern for contamination. Additionally, fencing of waterways to eliminate sheep and goats would create additional expense. River Iwi oppose the inclusion of sheep and goats to be excluded from waterways at this time.
Schedule C	PC1-11022	Auckland/Waikato Fish and Game	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government.
Schedule C	PC1-7091	Ballance Agri-Nutrients Limited	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion that Schedule C should align with the policies, methods, rules and definitions, etc. to which it relates.
Schedule C	PC1-11507	Beef + Lamb New Zealand Limited	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion to fence waterways up to a slope of 15 degrees, beyond this, other mitigation measures should be put in place as fencing can become impractical. The River Iwi support the notion that stock should be able to be actively driven through a waterway on a limited basis.
Schedule C	PC1-8199	Bevege, Richard Neil	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion that waterways in areas where slopes are >15 degrees should not be required to be fenced. As part of the mitigation in these areas, stocking rate should be decreased and well below the stated 18 SU/ha as this is considered a stocking rate in intensive farming systems.
Schedule C	PC1-2178	Brown, Tracy Lee	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government.
Schedule C	PC1-6422	Carter, Michael and Jackie, Matthew and Amy	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion to fence waterways up to a slope of 15 degrees. Identifying a method to assess slope accurately and fairly needs to be further discussed and River Iwi would like to opportunity to be part of this consultation.
Schedule C	PC1-8563	Carter, Shaun Colin Thomas	Support	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion that only that Schedule 1 should align with the policies, methods, definitions, etc. to which it relates.
Schedule C	PC1-3906	Cave, Rachel Ann	Oppose	Amendments proposed to delete Schedule C are opposed by the River Iwi. The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government.

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Schedule C	PC1-7413	Coleman, Mark and Ruth	Support	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government.
Schedule C	PC1-808	Collins, Nick	Oppose in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion to fence waterways up to a slope of 15 degrees. Identifying a method to assess slope accurately and fairly needs to be further discussed and River Iwi would like to opportunity to be part of this consultation.
Schedule C	PC1-9686	Craig, Jeffery	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the requirement to focus on sub-catchments and areas within sub-catchments that should be targeted for mitigation first. Likewise, the requirement to offer subsidies or funding to land owners to undertake mitigation will be essential for uptake of mitigation.
Schedule C	PC1-4135	Dairy Goat Co-Operative (N.Z) Ltd	Support	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion that wording and common terms (stock and livestock) need to be clear and used consistently to avoid confusion.
Schedule C	PC1-3629	Denize, Brendan	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion that waterways in areas where slopes are >15 degrees should not be required to be fenced. As part of the mitigation in these areas, stocking rate should be decreased and well below the stated 18 SU/ha as this is considered a stocking rate more aligned with intensive farming systems.
Schedule C	PC1-11055	Department of Conservation	Oppose in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. However, excluding sheep and goats at this time is not necessary as these species do not generally gather in waterways and cause concern for contamination. Additionally, fencing of waterways to eliminate sheep and goats would create additional expense. River Iwi oppose the inclusion of sheep and goats to be excluded from waterways at this time. The River Iwi would like to know why DOC have stated the required setback distances.
Schedule C	PC1-4910	Dudin, Alan and Sarah		The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion that wording and common terms need to be clear and used consistently throughout PC1 to avoid confusion. Furthermore, a waterbody should be further defined and include dimensions (width, depth).
Schedule C	PC1-10430	Farmers 4 Positive Change (F4PC)	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion that wording and common terms need to be clear and used consistently to avoid confusion. Terms should also align with National Policy.

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Schedule C	PC1-10852	Federated Farmers of New Zealand	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion that wording and common terms need to be clear and used consistently to avoid confusion. Terms should also align with National Policy.
Schedule C	PC1-10649	Fertiliser Association of New Zealand	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion to fence waterways up to a slope of 15 degrees, beyond this, other mitigation measures should be put in place as fencing can become impractical. The River Iwi would like to understand the reason behind the setback distances stated.
Schedule C	PC1-7829	Foreman, Kerry Alan		Amendments proposed to delete Schedule C are opposed by the River Iwi. The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government.
Schedule C	PC1-4067	Franklin Waikato Drainage Advisory Subcommittee		The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government.
Schedule C	PC1-8942	Fuchs-Hill Trust		The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government.
Schedule C	PC1-3284	Genetic Technologies Ltd	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the need for clarity on setback distances and the definition of a river bed.
Schedule C	PC1-2708	Harre, Raymond and Janet	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. All Land Owners should be responsible for diffuse discharge and no one land use should be exempt from this. The River Iwi would like all waterways considered as tributaries and streams lead to the main stem of the River and have a cumulative effect from diffuse discharge.
Schedule C	PC1-7908	Hill Country Farmers Group	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion to fence waterways up to a slope of 15 degrees, beyond this, other mitigation measures should be put in place as fencing can become impractical. The River Iwi support the notion to allow stock to be actively moved through a waterway once per week, any more than this and a stock crossing should be used.
Schedule C	PC1-5872	Hurley, Carl	Oppose	Amendments proposed to delete Schedule C are opposed by the River Iwi. The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government.
Schedule C	PC1-3541	Lea, Charles Steven	Oppose in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi

Table 1

				support the notion that waterways in areas where slopes are >15 degrees should not be required to be fenced. As part of the mitigation in these areas, stocking rate should be decreased and well below the stated 18 SU/ha as this is considered a stocking rate in intensive farming systems.
Schedule C	PC1-5993	McLaughlin, Kate	Oppose in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion that waterways in areas where slopes are >15 degrees should not be required to be fenced. As part of the mitigation in these areas, stocking rate should be decreased and well below the stated 18 SU/ha as this is considered a stocking rate in intensive farming systems.
Schedule C	PC1-8897	Miraka Limited	Oppose in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi oppose a one date for all for the short-term exclusion of stock as priority areas should be targeted and dealt with first.
Schedule C	PC1-8453	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Support	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government.
Schedule C	PC1-9582	Waikato and Waipā Branches of the New Zealand Deer Farmers	Oppose	Amendments proposed to delete Schedule C are opposed by the River Iwi. The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government.
Schedule C	PC1-3116	Waikato District Council (WDC)	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion where areas are impractical to exclude stock (steep hill country) then other mitigation options need to be considered. This should include a reduced stocking rate that is well below the stated 18 SU/ha as this is considered a high stocking rate in intensive farming systems.
Schedule C	PC1-6240	Waikato Environment Centre	Oppose in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi understand that the size and extent of this project requires time to establish stock exclusion, especially for larger properties. Reducing the time to do this may not be feasible.
Schedule C	PC1-3571	Waikato Regional Council	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion that wording and common terms need to be clear and used consistently to avoid confusion.
Schedule C	PC1-3234	Waipā District Council	Support in Part	Amendments proposed to delete Schedule C are opposed by the River Iwi. The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion that wording and common

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				terms need to be clear and used consistently to avoid confusion, that is within PPC1 and within National Policy. The River Iwi cannot support a recommendation based on a report/guidance document that hasn't yet been released.
Schedule C	PC1-11388	Wairakei Pastoral Ltd	Support	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government.
Schedule C	PC1-2147	Wairarapa Moana Incorporation	Support	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government.
Schedule C	PC1-7949	Waitomo Catchment Trust Board	Support in Part	The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the requirement to focus on sub-catchments and areas within sub-catchments that should be targeted for mitigation first. Likewise, the requirement for subsidies or funding to land owners to undertake mitigation will be essential for uptake of mitigation.
Schedule C	PC1-10846	Waitomo District Council	Oppose in Part	Amendments proposed to delete Schedule C are opposed by the River Iwi. The River Iwi support the requirements to progressively exclude livestock from waterways that is set out in Schedule C. Excluding livestock from waterways is consistent with recent national direction signalled by the Government. The River Iwi support the notion that wording and common terms need to be clear and used consistently to avoid confusion, that is within PPC1 and within National Policy.