SUBMISSION TO
WAIKATO REGIONAL COUNCIL

ON THE PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 –
WAIKATO AND WAIPA RIVER CATCHMENTS

FROM DAIRYNZ
27 Feb 2017

DairyNZ Submission on Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments

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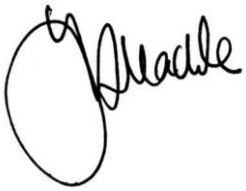
- I confirm that I am authorised on behalf of DairyNZ to make this submission.
- DairyNZ wishes to be heard in support of this submission.
- If other parties make similar submissions, DairyNZ would not consider presenting a joint case with those parties at the hearing.
- DairyNZ will not gain a trade competition advantage through this submission. DairyNZ will be directly affected by adverse effects that will result if Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments becomes operative in its current form. These adverse effects do not relate to trade competition or the effects of trade competition as defined by the Resource Management Act 1991.

Signed on behalf of DairyNZ



Tim Mackle
Chief Executive Officer DairyNZ

1. Introduction

1.1 DairyNZ welcomes the opportunity to submit on the Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments (the Plan Change). We acknowledge the excellent work that Waikato Regional Council (WRC) and Waikato and Waipa River iwi have undertaken with the Collaborative Stakeholder Group to get the Plan Change to this stage.

1.2 DairyNZ is the industry good organisation representing New Zealand's dairy farmers. Funded by a levy on milksolids and through government investment, our vision is for New Zealand dairy farming to have the world's most competitive and responsible dairy farming. DairyNZ's work includes research and development to create practical on-farm tools, leading on-farm adoption of farming within limits, promoting careers in dairying, and advocating for farmers with central and regional government.

1.3 The Strategy for Sustainable Dairy Farming 2013-2020 ("Making Dairy Farming Work for Everyone") signals the intent of dairy farming to be a part of New Zealand's future for the long term. DairyNZ supports the development of a resource management framework that achieves the sustainable management of natural and physical resources in an efficient and equitable way, whilst enabling social, cultural and economic wellbeing of people and communities.

1.4 This submission has been developed on behalf of dairy farmers. Many farmers attended consultation meetings across the region over the past two years. These include the meetings held during the CSG process as listed in the Waikato Regional Council database with a total of 55 meetings run by DairyNZ both during the CSG process and post notification. Farmers will also make their own submissions.

2 Submission summary

DairyNZ supports the overall intent of the Plan Change as the first stage of achieving the Vision and Strategy for the Waikato and Waipa River Catchments. DairyNZ notes a primary concern for farmers is the uncertainty of future plan reviews.

DairyNZ supports the Plan Change's requirement for immediate changes to how land is managed, and considers that the identified pace of change will achieve the identified short term water quality objectives, while ensuring that the social, cultural and economic fabric of local communities remain strong and that those communities remain viable. Any attempt to accelerate that pace of change or to make further changes without the necessary level of scientific understanding will put at risk the environmental, social, cultural and economic objectives, as well as threaten the viability of the local communities. For these reasons, DairyNZ supports the overall intent, provided:

a. The Plan Change retains the intent that full achievement of the Plan Change objectives for water quality improvement, is targeted for 2096, with the Plan Change being the first stage, and
b. All those contributing to contaminant discharges are required to take action, and
c. It is the actions occurring on land that will be used by WRC to assess progress toward the Collaborative Stakeholder Group's aim of ten percent of the way towards the 2096 long term water quality goals in the Plan Change, and

d. WRC sets up a comprehensive programme of work that involves DairyNZ and other research organisations to identify and resolve information gaps in time for the next plan review, and
e. Implementation of the Plan Change is made more effective by continuing to work with all key stakeholders, including DairyNZ to develop robust solutions and
f. By amending the wording of the objectives, policies, methods and to provide greater clarity and clearer guidance to farmers about changes expected on farm.

In our decision sought we have specified matters that we wish to see retained in the Plan Change and a range of detailed matters that we wish WRC to amend.

2. Decision sought

2.1 DairyNZ seeks the following decision on its submission on the Plan Change:

- That the Waikato Regional Council retain the Plan Change subject to the decisions sought that are referred to in Attachment 1 of this submission. Where text in the Plan Change is referred to, this is *italicised.* DairyNZ requests for deletions to existing text are ~~struck-through~~ and new text is <u>underlined</u>, and;
- Any consequential amendments that may be necessary to give effect to the decision sought in this submission, and/or
- Any alternative relief that will give effect to this submission, including, where specific relief is sought, words or phrases to similar effect.

4 Overview of topics covered in the submission

- Support for staged approach to achieving reductions in contaminant discharges to assist achieving the Vision and Strategy by 2096
- Ensure that the necessary information is gathered for use in the next plan review and next stages to achieve the Vision and Strategy
- Clarify what is expected of landowners and show how these expectations relate to the short term water quality targets
- Provide guidance on circumstances and mitigations that achieve reduction of contaminants to waterbodies but are not currently robustly modelled in OVERSEER and how these mitigations are to be accounted for
- Clarify the definition of certified persons and clarification of who will be acceptable
- Land use change/land conversions - Ensure there are careful checks on land use change that might increase contaminants to waterbodies
- Ensure stock exclusion is achieved and practical, including clarifying that alternatives to fences are acceptable on steep land where appropriate
- Relate cultivation requirements near waterbodies more closely to the risk of adverse effects
- Ensure that appropriate alternative mitigations that will achieve any prescribed standard in the Plan Change are provided for.

Attachment 1: Plan Change provisions supported or opposed, reasons and decision sought

	Section of Plan Change	Provision and page number	Support Or Oppose	Decision Sought	Reason for submission
1	Background and explanation	Paragraphs 1-3 under heading 'Full achievement of the Vision and Strategy will be intergenerational' page 15. Para 1 under heading 'Reviewing progress' page 16	Support, subject to making amendments	Retain the provisions of the Plan Change that are related to the staged approach to achieving the Vision and Strategy. Retain the text referring to the overall intent of the Plan Change. Amend the first paragraph of *Reviewing progress toward achieving he Vision and Strategy* on pg. 16 to delete ~~*"on-farm actions"*~~ and replace with *"land based actions"* to provide a sector neutral approach.	DairyNZ supports a staged approach to managing contaminant discharges to assist achieving the Vision and Strategy by 2096. We support the current staged approach where farmers make positive progress towards achieving the 80-year water quality targets, and would be very concerned if this is removed or amended. Farmers should be given time to make the necessary changes because the water quality objectives of the Plan Change will have far reaching impacts on the community. A staged approach acknowledges that this first stage includes preparation for later plan changes, and that it is going to take time and effort to set up new ways of farming to limits. Having a sector neutral approach will reinforce that all contributors to the contaminant load in waterbodies are required to take action.
	Objectives				
2	Objectives	Objective 3 page 27	Support, subject to amendments	Amend Objective 3 to read: *Objective 3: Ten percent ~~Short-term~~ improvements~~s~~ in water quality as the first stage of achieving Objective 1~~-restoration and protection of water quality for each~~*	DairyNZ supports an objective that sets out the water quality improvement outcome expected in the life of the Plan Change. The changes requested by DairyNZ are minor wording changes with the aim of improving the clarity of the

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				~~*sub-catchment and Freshwater Management Unit*~~*/Te Reo translation* *Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment, and microbial pathogens, are sufficient to achieve ten percent of the required change between* ~~*current*~~ *water quality in 2016, and the 80-year water quality attribute^targets^ in Table 3.11-1. A ten percent change towards the long term water quality improvements is indicated by the short term water quality attribute^ targets^ for each monitoring site listed in Table 3.11-1."*	Objective. Changes are requested to the heading and text by replacing general terms 'short term' and 'current', with terms that will make more sense to plan users over the life of the Plan Change. Another minor change is to clarify that Table 3.11-1 is a list of existing water quality monitoring sites. This change is important because Schedule 1 of the Plan Change refers to sub-catchments rather than monitoring sites. The short term targets in Objective 3 Table 3.11-1 list monitoring sites and there is no reference to sub-catchments. The monitoring sites are not representative of sub-catchment water quality because the location of each site is not always at the downstream end of the sub catchment where it joins the main stem of the River.
3	Objectives	Objective 3 Table 3.11-1 Pages 56-66	Support, subject to amendments	Amend the fourth paragraph of the explanation Table 3.11-1 on page 56, so that it reads: *The achievement of the attribute targets in Table 3.11-1 will be determined through analysis of 5-yearly monitoring data. Table 3.11-1 lists existing water quality monitoring sites. There is a monitoring site within each sub-catchment. However, the site does not necessarily represent all the surface water flowing from that sub-catchment, as monitoring sites are not all at the downstream confluence of the*	DairyNZ support explanations to Objective 3 on page 56, that acknowledge that achievement of the objective will rely on actions on the land to reduce pressures on the water body, rather than a measurable 10% change in the water quality attributes at monitoring sites. Because Objective 3 Table 3.11-1 also lists numerical water quality attributes, this is potentially confusing for plan users. The short term targets in Objective 3 Table 3.11-1 list monitoring sites and there is no reference to sub-catchments. The monitoring sites are not representative of sub-catchment water quality

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				tributary and the main stem of the Waikato or Waipa River. The variability in water quality (such as due to seasonal and climatic events) and the variable response times of the system to implementation of mitigations may mean that the targets are not observed for every attribute at all sites in the short term. Therefore, Waikato Regional Council will rely on collating and reporting actions put in place, as set out in Policy 1d., and Methods 3.11.4.10 and 11.	because the location of each site is not always at the downstream end of the sub catchment. Even if sub-catchment water quality targets were in the Plan Change, there is no assistance for landowners to connect actions on the land with effect in the water, particularly where there is a time lag between actions on farm and improvement in measured water quality.
4	Objectives	Objective 3 Reasons for adopting Objective 3 page 29	Support, subject to amendment	Amend the first paragraph of Reasons for Adopting Objective 3 on page 29 so that it reads: ***Objective 3*** *sets short term ~~goals~~ targets for a 10-year period, to show the first step toward full achievement of water quality consistent with the Vision and Strategy. As noted in the explanation to Table 3.11-1 on page 56, water quality targets are not intended to be used directly as receiving water compliance limits/standards.*	DairyNZ supports the explanation to Objective 3 on page 29 of the Plan Change, because it acknowledges that achievement of the objective will rely on actions on the land to reduce pressures on the water body, rather than being able to measure a 10% change in the water quality attributes at monitoring sites. DairyNZ requests several minor changes. One request is to make the language consistent with the rest of the Plan Change, by replacing 'goals' with 'targets'. Objective 3 has two explanatory statements. DairyNZ requests a minor change to link the brief explanation on page 29, with the much more comprehensive explanation on page 56, with the heading that begins with "Table 3.11-1: Short term and long term numerical water quality targets…"

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5	Objectives	Objective 4 page 27	Support, subject to making amendments	Amend the first paragraph of Objective 4 so that it reads: *Objective 4: People and community resilience/Te Whāinga 4: Te manawa piharau o te tangata me te hapori* *A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, economic, and cultural wellbeing <u>and assist community resilience</u>, while:*	DairyNZ supports an objective that makes it clear that the Plan Change is the first stage of an 80 year programme, and that community resilience relies on farmers being given time to make the necessary changes to achieve the water quality objectives of the Plan Change. The change requested is to make the language more specific, and clarify that the positive effect of a staged approach, is that community resilience can be maintained. A resilient community will enable the next plan review to be managed more easily.
	Policies				
6	Policies	Policy 1	Support, with amendments	Amend Policy 1 to add a new clause to set out the course of action to implement Objective 3. Policy 1 should read: *Policy 1: Manage diffuse <u>and point source</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens/Te reo translation* *Manage and require reductions in sub-catchment-wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by:*	DairyNZ supports Policy 1 as an overarching policy, and requests more guidance about how Objective 3 will be achieved. As written, Policy 1 is very general. DairyNZ has suggested some wording that retains the general nature of the policy, but is more accurate in what we believe is the course of action to achieve the objectives. <u>Policy 1 heading and clause a).</u> DairyNZ have requested changes to broaden the policy to include the whole approach of the Plan Change. This includes point sources. There are 4 policies to guide management of point source

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				a. Enabling activities with a low level <u>or a managed low risk</u> of contaminant discharge to water bodies provided those discharges do not increase; and *b. Requiring farming activities <u>to be managed through a tailored, risk-based approach, including;</u>* *<u>i. each farm and enterprise and demonstrating achievement of industry-agreed good management practice, and;</u>* *<u>ii. pastoral farms</u> with moderate to high levels of <u>nitrogen leaching over a specified amount</u> ~~contaminant discharge to water bodies, or for~~ to reduce their <u>nitrogen</u> discharges~~;~~ and* c. *Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes; <u>and</u>* *<u>d. Analysing and reporting the effects of mitigation actions to demonstrate Objective 3 is achieved, and acknowledging time lags in the water and on the land.</u>*	discharges with no corresponding overarching policy for point source discharges. Clause a). should also contain reference to the course of action to enable low risk properties to continue to operate within permitted activity conditions, and for farms which are tightly managed under a certified scheme, to acknowledge that the Plan Change will enable these to continue without the need for a resource consent. <u>Policy 1 Clause b).</u> DairyNZ requested changes are the inclusion of two new sub-clauses to clause b). to more clearly spell out the approach for pastoral farming. These are labelled i). and ii). The reason for the inclusion of two new sub-clauses to clause b)., is to improve the link between actions and water quality targets. The section 32 notes that the modelling of the proposed Plan Change provisions would achieve reductions of contaminant through widespread adoption of Good Management Practices and nitrogen reductions required from some pastoral farms. DairyNZ supports the Plan Change's requirement for changes to how land is managed. We support Schedule 1 setting out a thorough risk management assessment of the four contaminants. As a result, farmers will be required to make changes to management practices. DairyNZ has assumed that changes required in the FEP, will be in line with the DairyNZ 2016 GMP publication. The exception to this

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					approach are farms above the 75th percentile nitrogen number, who have to make more far reaching changes to the farm system to reduce nitrogen. It would assist plan users to relate the risk-based approach to actions on pastoral land, to what is considered good management practice (GMP). For example, DairyNZ has produced a 2016 guideline entitled 'Guide to Good Environmental Management on Dairy Farms'). This guideline is intended to be clearer about actions on-farm, than the related guidelines (WRC "menu of farm practice", Canterbury GMPs done as part of the matrix of good management dated 9 April 2015). <u>Addition of a new clause d). to Policy 1</u> To demonstrate the success of Objective 3 within the first ten years of the Plan Change, WRC will need to collate and analyse actions taken on the land to reduce pressures on water quality. It is appropriate to add this course of action to the overarching policy 1. It will then link more clearly to Methods 10 and 11 of the Plan Change. The Plan Change acknowledges that achieving the numerical attributes in Objective 3 Table 3.11-1 is likely to take longer than ten years and will relate to actions on the land rather than changes in water quality attributes. Because Objective 3 could be interpreted in different ways, DairyNZ has requested changes at a policy level, to more clearly set out <u>how</u>

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					the outcome sought in the life of the Plan Change will be achieved.
7	Policies	Policy 2 page 30	Support, subject to making amendments	Retain Policy 2 first sentence. Amend clause a. – d. and add a new clause e. to Policy 2. Policy 2 a – e. should read: *a. Taking a tailored, risk based approach to define mitigation actions on the land ~~that will reduce~~ <u>for</u> diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a Farm Environment Plan either associated with a resource consent, or in specific requirements established by participation in a Certified Industry Scheme; and* b. retain c. retain d. *Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the ~~amount~~ <u>risk</u> of current discharge <u>leaving a property from overland flow or leaching below the root zone, as identified in farm environment plans</u> ~~entering waterbodies~~ (those discharging*	DairyNZ supports the intent of Policy 2 to apply a risk based approach to managing contaminant discharges. DairyNZ notes that Policy 2 could be improved through clearer direction about expectations regarding diffuse contaminant reductions in the FEP approach of Rules 3.11.5.3 and 3.11.5.4. and related schedules. <u>Part a). of the policy</u> DairyNZ has suggested a minor change to make clause a. more generally applicable and accurate about the overall approach. The detail of the approach can be contained in subsequent clauses. <u>Part d). of the policy</u> DairyNZ has suggested changes to link actions on farm to what is to be achieved in the objectives. Taking out the reference to 'amount' of discharge is appropriate, because measuring or modelling the farm-level amount of diffuse sediment, phosphorus and microbial pathogens entering water is not practical, as concluded in the section 32 report. At present the policy is worded in a way that suggests this is possible. As noted in the explanation to Objective 3 Table 3.11-1, there will be time-lags where changes to mitigate

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				more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment plan; and e. *Where sub-catchment plans do not exist, individual Farm Environment Plans shall ensure that that the risk of diffuse phosphorus, nitrogen, sediment, and microbial pathogens entering waterbodies is identified by suitably qualified and experienced people, and time-bound and monitored actions are put in place to address risks of phosphorus, sediment and microbial contaminants. For diffuse nitrogen discharges, Farm Environment Plans will:* *i. ensure that nitrogen losses stay within a five year rolling average, and* *ii. for farms above the 75th percentile value, nitrogen losses decrease to that value, and* *iii. for all other farms, nitrogen losses do not exceed the Nitrogen Reference Point.*	and reduce contaminants on the land are not likely to be able to measured in the water in the short term. Policy 2 d). should be re-phrased to describe the purpose of the FEP approach and how it fits with sub-catchment plans, that are yet to be developed. DairyNZ notes that in future, sub-catchment plans could assist by breaking down the task of achieving water quality goals. They are anticipated in the Plan Change, but do not currently exist and therefore cannot be relied on to facilitate the achievement of short term targets in this Plan Change. However, if sub-catchment plans are created in the next ten years, they could play a role in setting out the issues are for each sub-catchment. It would be helpful to refer to the development of sub-catchment plans at a policy level. This is currently only introduced at a non-regulatory method level, in method 3.11.4.5. We also consider more policy guidance is needed to connect the objectives with the method. Part e). of the policy DairyNZ has suggested expanding the policy to more clearly set out the course of action for achieving Objective 3. The changes are intended to separate the management of nitrogen from that of the other three contaminants. This provides clarity for plan users that mitigation actions for nitrogen discharges do not need to be defined and specified in a descriptive time-

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					bound action in the Farm Environment Plan, in the same way that mitigations for phosphorus, sediment and microbes will need to be. Clauses I – iii. have been added to spell out how FEPs will manage nitrogen on a five year rolling average, and that farms will fall into two categories – those capped at their NRP in the life of the Plan Change, and those who must reduce nitrogen because their NRP is above the 75th percentile value.
8	Policies	Policy 5 'Staged approach' page 31	Support	Retain	DairyNZ supports farmers being given time to make changes to address diffuse discharges. A staged approach acknowledges that the Plan Change includes preparation for later stages, and that it is going to take time and effort to set up new ways of achieving the desired water quality.
9	Policies	Policy 7 page 32	Support, subject to making amendments	Retain provisions of the Plan Change that are focused on information and processes needed for plan reviews. The focus should be on the course of action to fill information gaps before WRC commences the review of the Plan Change. Amend Policy 7 to read: *<u>Identify and fill information gaps to</u> Prepare for further diffuse discharge reductions and ~~any~~ future property or*	DairyNZ supports guidance about information gaps to be filled, to anticipate subsequent plan reviews, and achieve Objective 1 of the Plan Change. As worded, the policy re-states Method 7. Some of the text of this policy is very operational and task focused, and more appropriately covered in a method. To maximise the innovative technical solutions that are needed to meet the 2096 water quality targets, WRC will need to partner with organisations who are also working on these topics, including national science programmes co-funded by DairyNZ, and regional case studies and DairyNZ demonstration

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				enterprise-level ~~allocation~~ limits of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that ~~will~~ may be required by subsequent regional plans, ~~by implementing the policies and methods in this chapter.~~ To ensure this occurs, ~~-~~research will be undertaken in partnership with technical and industry organisations, in a manner that allows people and communities to understand the social, environmental, cultural and economic implications of the current plan, and engage in debate about any future limits. ~~collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'~~ Delete a-d of Policy 7.	farms. DairyNZ's programme of science and economic research assists identifying farming practices required in the future to meet water quality outcomes. Significant issues that have not been resolved during the current plan change process include the differing effect of contaminant discharges on river values relative to their spatial location; impact of hydro-dams on water quality; nutrient allocation methodology; nutrient attenuation; and social/economic consequences of new rules on rural communities. Understanding the time lag between Farm Environment Plans being put in place and results seen in the water is crucial, particularly as WRC reports progress on the Plan Change to the wider community. DairyNZ requests changes to Policy 7 so that it sets out the course of action for investigations over the life of the Plan Change, and provides the link to methods to ensure Objective 3 is met. Filling information gaps will enable the community to fully participate in choosing water quality actions required in the next plan review. As written Policy 7 a. – d. is a list of criteria for choosing limits in a subsequent plan review. We consider they are not relevant to this Plan Change and do not need to be included.
10	Policies	Policy 6 page 32	Support, subject to	Amend the policy so that it reads:	DairyNZ supports the intent of the Plan Change to restrict wholesale land use change.

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			making amendments	*Policy 6: Restricting land use change/Te Kaupapa Here 6: Te here i te panonitanga ā-whakamahinga whenua* *Except as provided for in Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted.* *Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted.* *Land use changes will generally be approved, where the mitigations proposed in the Farm Environment Plan;* *a. do not increase the discharges of phosphorus, sediment and microbial contaminants, and* b. *can demonstrate there will be no increase in the nitrogen reference point*	Retain policy guidance in the Plan Change that applications for consent to increase discharges leaving a property, where they are not reduced by an equivalent amount on another property, will generally be declined. If land use change occurs and more contaminants reach waterbodies, this makes the Vision and Strategy harder to achieve. If contaminants discharged in one area increase, this means contaminants must be reduced by an equivalent amount in another area, and/or by another landowner, just to maintain the status quo. It is important that wholesale land use change is restricted (for instance, when the whole property goes from trees to pasture). Any resulting increases in discharges will potentially restrict options for existing landowners in the next plan review. At the same time, the policy should not inadvertently restrict land use changes that have a neutral or beneficial effect on waterbodies. The existence of the NRP provides confidence that adverse effects will not occur, for instance when a mixed farm changes the extent of the cropping area from year to year. DairyNZ has requested an additional clause that sets out that it is generally acceptable for land use change

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					to be approved where the effects are either neutral or reduce contaminants.
11	Policies	Policy 9 page 33	Support, subject to making amendments	Retain Policy 9, and amend to clarify that identifying spatial location of mitigations in sub-catchment plans, will inform what is required of dairy farmers in Farm Environment Plans. Amend Policy 9 to add a new clause e. that reads: *e. Where landowners contribute to mitigations as set out in c – d., to recognise this contribution through funding assistance and formal and enduring mechanisms that give the community and the landowner confidence that improvements in water quality are achieved.*	DairyNZ supports in principle, Plan Change provisions that relate to sub-catchment planning, and requests that a stronger link with achievement of Objective 3 and Policy 2 is made. Sub-catchment plans could be a helpful way to inform the relative priority of mitigations in individual FEPs, as indicated in Policy 2. This includes cost effective solutions based on the drivers for the existing water quality, and spatial location and type of mitigations. DairyNZ supports sub-catchment plans being produced before individual FEPs being required. If this is the case, sub-catchment plans could assist with prioritising actions in FEPs as well as identifying locations for mitigations that service more than one property. For instance, edge of field mitigations such as medium to large scale wetlands can be constructed or existing ones enhanced. This could lead to achieving the Plan Change objectives at a lower cost to the community.
12	Policies	Policy 16 page 35	Support	Retain	DairyNZ supports the policy intent and requests that the policy continue to signal that applications to change land use should demonstrate that the resulting land use will utilise technology and

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					knowledge to minimise nitrogen leaching and runoff of sediment, phosphorus, and microbial contaminants. It is appropriate to provide policy guidance that can be used in circumstances where applications are received under a non-complying rule to change land use on tangata whenua ancestral lands.
	Methods				
13	Methods	Method 3.11.4.7 Page 37	Support, subject to making amendments	Amend method 7 so that it reads: *3.11.4.7 Information requirements to determine the need for property-level limits on diffuse discharges and any future allocation/Te reo translation* *Waikato Regional Council will take a broad-based and integrated approach to assessing existing information and new information gathered through this Plan Change. It will do this in partnership with other agencies and industries, commissioning research on the effects of property-level limits on waterbodies, and implications for individuals and communities, ~~Gather information and commission appropriate scientific research to inform any future framework for the allocation of diffuse discharges~~ including:*	DairyNZ supports a partnership approach to using FEP information and setting up research that will result in better knowledge of the improvement in environmental footprint and the most effective and efficient way to achieve the long term water quality. DairyNZ requests the method signals that WRC will involve research organisations; in assessing existing approaches, and research to inform the basis for any property-level limits in the next plan review. The methods of the Plan Change should set out a programme of work that will ensure WRC will have an accurate assessment of all sources that contribute to the load of contaminant from the land, and can track changes in diffuse and point source discharges because of actions required in the Plan Change. In order to prepare for the next Plan Change, this should occur at the scale of individual landowners and businesses.

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				a. If shown to be required implementing processes that will support the setting of property or enterprise-level diffuse discharge limits in the future. *b. Researching:* *i. The quantum of contaminants that can be discharged at a sub-catchment and Freshwater Management Unit^ scale while meeting the Table 3.11-1 water quality attribute^ targets^.* *ii. Methods to categorise and define 'land suitability'.* *iii. Tools for measuring or modelling discharges from individual properties, enterprises and sub-catchments, and how this can be related to the Table 3.11-1 water quality attribute^ targets^.* *<u>iv. Spatial variability in how land use and mitigations, and the effect of impounded water in hydro-dams affect water quality at a variety of scales, to analyse where mitigations can be put in place for the least cost to the regional community.</u>*	DairyNZ supports the intent of the method and requests further detail about the information to be gathered. This will increase confidence that Plan Changes objectives will be achieved. The review of the Plan Change will require information about the sorts of communities desired in the catchment and social and economic impacts of any alternative property-level limits or allocation options that may be required. It will take time to gather broadly -based, robust, and technically-justified information that will be used to develop methods to be implemented in the next plan change. For instance, new technologies to reduce farmer environmental footprint, and the different effect of contaminant discharges on river values relative to their spatial location was not able to be considered in the development of the Plan Change due to the lack of information and science. Information gathering should encompass the full range of potential impacts of any future contaminant reduction and any allocation regime at a property-level. People and communities will be impacted in different ways and locations and must be accounted for. The integrated assessment approach used in the development of the Plan Change and referred to in Part C of the Section 32 should be expanded and developed.

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14	Methods	Method 3.11.4.8 Page 38	Support, subject to making amendments	Amend Method 8 to read: 3.11.4.8 Reviewing Chapter 3.11 and developing options ~~an allocation framework~~ for the next Regional Plan/Te arotake i te Upoko 3.11, te whakarite hoki i tētehi anga toha mō te Mahere ā-Rohe e whai ake ana Waikato Regional Council will: a. Develop options to reduce discharges ~~allocation frameworks for~~ from individual properties and enterprises based on information collected under Method 3.11.4.7, taking into account the best available data, knowledge and technology at the time; and b. Use this to inform future changes to the Waikato Regional Plan to manage discharges of nitrogen, phosphorus, sediment and microbial pathogens at a property or enterprise-level to meet the targets^ in the Objectives.	DairyNZ notes that Method 3.11.4.8. could be improved if it is made more general, thus leaving room for a bigger range of options to be considered. Reviewing Chapter 3.11 will require an analysis of frameworks to manage both point source and diffuse discharges of contaminant. This should be covered in this method, as it is the only method that refers to the next Regional Plan. The other overly narrow aspect of the method, is that it focuses on one option to manage diffuse discharges, which is that landowners are required to manage to a specified allocation. Plan users may assume that the term 'allocation frameworks' refers to a nitrogen allocation. Nitrogen is the only diffuse contaminant that Regional Plans have allocated to individual landowners. The Plan Change seeks to manage phosphorus, sediment and microbial pathogens, in addition to nitrogen. The reference to allocation frameworks is potentially confusing for plan users, and is not needed to implement information gathering and analysis for the next plan review, as envisaged in Methods 7 and 8.
15	Methods	Method 3.11.4.10	Support, subject to	Amend the Method 10 and 11 as follows:	DairyNZ believes that the critical measure of success of the Plan Change will be in demonstrating that individual landowners and businesses have reduced

	Section of Plan Change	Provision and page number	Support Or Oppose	Decision Sought	Reason for submission
		And Method 3.11.4.11	making amendments	Delete clause d). in Method 3.11.4.10 and shift it to Method 11 Method 10 should read: 3.11.4.10 Accounting system and monitoring – Freshwater Management Units/Te pūnaha kaute me te aroturuki Retain a), b). c). ~~d. An information and accounting system for the diffuse discharges from properties and enterprises that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at an enterprise or property scale.~~ Method 3.11.4.11 should read: *3.11.4.11 Accounting system and monitoring – Land activities that affect water ~~Monitoring and evaluation of the implementation of Chapter 3.11~~* *Waikato Regional Council will* *a. review and report on the progress towards and achievement of the 80-*	their environmental footprint. The accounting and monitoring aspects of the Plan Change could be strengthened. This would greatly improve the link between Methods 10 and 11 and Objective 3. It would be helpful for plan users if Method 10 and 11 were adjusted by making them mirror images of each other. The National Policy Statement for Freshwater Management (NPS-FM), allows councils to set up systems to account for contaminants leaving land, by gathering and assessing information about land use practices. Method 10 could be amended to focus it solely on accounting for what can be measured and modelled in the water, and Method 11 amended to focus on developing accounting frameworks that link what happens on the land with what is seen in the water. Method 11 DairyNZ has requested that clause d. of Method 10 be included in Method 11 instead (as new sub-clause a).i) as it is related to monitoring and accounting changes on the land and how they will meet Objective 3. The methods of the Plan Change should set out a programme of work that will ensure WRC will have an accurate assessment of all sources that contribute to the load of contaminant from the land, and can track changes in diffuse and point source discharges as a result of actions required in the Plan Change. To

	Section of Plan Change	Provision and page number	Support Or Oppose	Decision Sought	Reason for submission
				year water quality objectives of Chapter 3.11. *a.i) Set up a monitoring and accounting system for diffuse discharges that documents current contaminant loads of nitrogen, phosphorus, sediment and microbial pathogens, and expected future loads after mitigation actions are put in place and implemented.* *b. Research ~~and~~ identify and implement ~~methods~~ a programme of work to assess ~~measure~~ actions at a sub-catchment, property and enterprise level, ~~and~~ for their contribution to reductions in the discharge of contaminants.* *c. Monitor the achievement of the values^ for the Waikato and Waipa Rivers and the uses made of those rivers.* *d. Collate data on the number of land use resource consents issued under the rules of this chapter, the number of Farm Environment Plans completed, compliance with the actions listed in Farm Environment Plans, Nitrogen Reference Points for properties and enterprises, and nitrogen*	prepare for the next Plan Change, this should occur at the scale of individual landowners and businesses. Clause e). DairyNZ request this clause is broadened. Over the past five years, DairyNZ has developed expertise in modelling the effect of actions undertaken to mitigate nitrogen on-farm, as part of its Sustainable Milk Plans. This knowledge could be used to assist in setting up the accounting and monitoring systems. DairyNZ could contribute by: • Defining practicable actions that can be monitored by WRC, and can be easily collated in databases. • Methodologies for predicting and analysing water quality changes because of these actions, to demonstrate reduction in environmental footprint from each farm.

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				discharge data reported under Farm Environment Plans. *e. <u>Prepare for plan reviews</u> by work<u>ing</u> <u>in partnership</u> with industry <u>to achieve a-d above, in order to gain an accurate assessment of all sources that contribute to contaminant loads from the land, and track changes in diffuse and point source discharges at the scale of individual landowners and businesses, and</u> collate information on the functioning and success of any Certified Industry Scheme.*	
16	Methods	Method 3.11.4.12 Page 38	Support, subject to making amendments	Amend Method 12 so that it reads: 3.11.4.12 Support research and dissemination of ~~best practice~~ guidelines to reduce diffuse discharges/Te taunaki i te rangahautanga me te tuaritanga o ngā aratohu mō ngā mahi tinowhai take hei whakaiti i ngā rukenga roha Waikato Regional Council will: a. Develop and disseminate ~~best management practice~~ guidelines for reducing the diffuse discharges of nitrogen,	DairyNZ supports the intent of the method to produce guidelines about reducing the environmental footprint of farms through mitigations targeted at diffuse discharges of contaminants. DairyNZ requests amendments to the method so that is it is more specific about assisting farmers in the life of the Plan Change, and as preparation for the next plan review. DairyNZ support the need to develop guidelines for what is expected of farmers. The terminology 'best management practice' and 'good management practice' have different meanings to different people. The term 'best management practice' is used in this method but not in the FEP rules or relevant schedules. Therefore the term is not necessary and can simply be covered by 'guidance for reducing diffuse discharges'.

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				phosphorus, sediment and microbial pathogens; and b. Work with primary industry and support research into methods for reducing diffuse discharges of contaminants to water.	To ensure consistency and effective and efficient outcomes on farms, guidance for plan users in assessing, requiring and monitoring mitigation practices on dairy farms is essential.
17	Methods	New Method on guidelines for mitigations outside OVERSEER	Support, subject to making amendments	Add a new method to the Plan Change that requires WRC to work with research agencies and industry bodies to develop a robust and peer reviewed guide on mitigations. The Method should read: ***Method 3.11.4.13 Research and dissemination of edge of field mitigations that reduce diffuse contaminants/Te reo translation*** *Waikato Regional Council will research and disseminate a guideline to assist Certified Farm Environment Planners, WRC and landowners choose effective edge of field mitigations that address the risk of discharges from an individual farm context and will reduce the diffuse discharge of nitrogen, phosphorus, sediment and microbial contaminants, by:* *a. Evaluating existing general guidelines*	DairyNZ supports in principle that mitigations outside OVERSEER should be able to be included when Farm Environment Plans are produced. Implementing these provisions should involve relevant research agencies to develop guidelines for what mitigations are acceptable and how they will be implemented. Rule 4 clause iii) page 43 sets up the opportunity to give more flexibility for farmers to be innovative. However, it is also very general. DairyNZ notes that mitigations that should be included in this research will include 'edge of field' mitigations such as wetlands, bunds and sediment traps. In addition, including mitigations and farm systems currently being trialled at a farm scale but not acknowledged in Overseer e.g. diverse pasture species that result in less nitrogen leaching. The Plan Change must provide a way forward to develop guidance as to what mitigations outside OVERSEER are appropriate and how they are to be accounted for. Plan users should have guidance about

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				b. *Involving technical experts in soil conservation, riparian and wetland management, nutrient management and OVERSEER from council, industry and research organisations in the development of solutions* c. *Develop a schedule that is linked to Rule 3.11.5.4 that describes acceptable mitigations such as constructed or natural wetlands that are not accounted for currently in OVERSEER.* d. *Setting up processes to facilitate mutual understanding between landowners and technical experts.*	what mitigations can have credit that are outside Overseer model.
	Rules				
18	Rules	Rule 3.11.5.4 page 42 and 43	Support	Retain Rule 4, including retaining clause iii) as written, or wording to the same effect that gives ability for WRC to consider and approve mitigations that will reduce the amount of diffuse contaminants leaving a property, even if the mitigation is not currently able to be adequately modelled in the OVERSEER model.	DairyNZ supports Rule 4 clause iii) page 43 in the Plan Change that allows for mitigations to be put in place that are not currently robustly modelled in OVERSEER, if nitrogen leaving the property does not increase. The Plan Change should ensure farmers are making changes to achieve the same or less contaminant entering waterbodies. The way contaminant losses are tracked should not unnecessarily constrain innovation. However, the Plan Change must provide guidance as to what mitigations outside OVERSEER are appropriate and how they are to be accounted for.

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					Plan users should have guidance about what mitigations can have credit that are outside Overseer model. DairyNZ has requested a new method *"*Method 3.11.4.13 Research and dissemination of edge of field mitigations that reduce diffuse contaminants." Guidance about mitigations that reduce nitrogen but where there is less confidence they can be adequately modelled in OVERSEER, will also enable the farms over the 75th percentile nitrogen leaching value for each Freshwater Management Unit to be identified. Given the requirement for farms over the 75th percentile reducing nitrogen leaching, DairyNZ support the Nitrogen Reference Point to be used to holding nitrogen leaching from all other properties in the life of the Plan Change. DairyNZ support is with the proviso that the reference year is chosen by the farmer, and a five year rolling average gives some flexibility to manage climatic and other variables. DairyNZ has also requested changes to Schedule B to clarify how changing OVERSEER versions will be managed. The change requested to Schedule B is to allow farmers to choose to re-calculate their NRP if a new version of OVERSEER is released.
19	Rules	Rule 3.11.5.3	Support	Retain	DairyNZ supports the Plan Change having a permitted activity alternative with safeguards related to certification of a scheme administering the FEPS in this rule. The permitted activity is administratively

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					efficient for both Councils (as consent authorities) and landowners.
20	Rules	Rule 3.11.5.7 page 45	Support, subject to making amendments	Add an advice note to the rule that reads: *Advice note: Changes in land use described above where the resulting land use will not increase diffuse discharges of contaminant, (including that they do not exceed the property or enterprise's Nitrogen Reference Point), will generally be granted. This will be able to be established at the time that the farm or enterprise has completed a Farm Environment Plan and are managing within their Nitrogen Reference Point.*	DairyNZ supports the non-complying activity status of the rule that sets up a high barrier to wholesale conversion of land from a lower to a higher contaminant discharging land use. However, on many farms, the 4.1 hectare threshold will mean that it will capture small changes on farm that are just above the 4.1 hectare threshold, that may have no more than minor adverse effects. For this situation, it would be inefficient to require landowners to apply for a non-complying activity consent. For instance, clause 3. of the rule states that arable cropping to dairy farming is captured. Maize is defined as an arable crop. The amount of maize grown on a farm is often more than 4.1 hectares. The safeguard for achievement of Objectives in the Plan Change, is that the Nitrogen Reference Point (NRP) is held at the five year rolling average. Therefore, the NRP will ensure the environmental effect of a maize crop over 4.1 hectares being introduced on a farm is appropriately managed. In this example, the environmental footprint of a farm that changes land use according to the current drafting of Rule 3.11.5.7, is no more in 2017 as it was in 2015/16. Therefore, in the absence of an alternative rule for these situations, the Plan Change will require these farmers to apply for a non-complying activity consent.

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					Guidance at both the policy and advice note will assist plan users. DairyNZ requests an advice note to the rule that refers plan users back to the policy guidance in the DairyNZ decision sought for Policy 6, that land users changes with a neutral effect on waterbodies will generally be granted.
	Definitions				
21	Definitions	Definition of setback page 83	Oppose, unless amendments made	Retain a definition of setback in the Plan Change, and clarify the existing term by spelling out that a setback is a measured distance between two points, where the point nearest the waterbody or wetland is clarified and made consistent with the operative Waikato Regional Plan. The definition of setback should read: *Setback: means the distance from the top of the bank ~~bed~~ of a river or lake, or margin of a wetland and the activity specified in Chapter 3.11. (To assist interpretation of what is considered the top of banks of rivers, see Section 4.1 of this Plan).*	DairyNZ supports setbacks from waterbodies for some activities that have a high risk of contaminants entering water. In order for the setback provisions to be implemented, the Plan Change must be clear about how the setback distance is measured. The definition does not refer to the point on the land at which the activity of concern can start i.e. the cultivation. Of more concern however, is that setback from the waterbody or wetland does not give plan users any guidance about where to start the measurement. It would be appropriate to be consistent with the remainder of the Waikato Regional Plan and start the measurement of setbacks from the top of the bank of rivers and lakes. The operative Regional Plan includes helpful interpretation text and diagrams in the first page of the River and Lake Bed Module (section 4.1 of the Operative Regional Plan). It is more problematic to define the outer margin of a wetland, as margins may change. The glossary of terms in the Operative

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					Regional Plan defines wetlands, and includes a phrase about margins, that should be used in interpreting setbacks from wetlands for Chapter 3.11. The phrase focuses on land-water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions. Relying on this phrase would exclude situations where pasture and scattered rushes are temporarily standing in water.
22	Definitions	Definition of Certified Farm Nutrient Advisor	Oppose, unless amendments made	Alter the definition so that it reads: **Certified Farm Nutrient Advisor:** is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a certified farm nutrient advisor and has the following qualifications and experience: a. Has completed nutrient management training to ~~at least intermediate~~ advanced level, and b. Has experience in nutrient management planning.	DairyNZ supports the development of a list of appropriately qualified and experienced people. DairyNZ notes that the skill set and experience in managing nitrogen is the same regardless of whether this is done to establish the NRP, or to manage nitrogen under the Farm Environment Plan. DairyNZ is concerned that the timeframes set out in Rules 3.11.5.3 and 3.11.5.4 are not achievable unless the Plan Change ensures there is a sufficient pool of certified nutrient advisors and certified farm environment planners to be available to meet the deadlines. If this is the case, then the dates in the FEP are more likely to be achievable. There is a different skill set in nitrogen management than for the other three contaminants. Nitrogen is the only contaminant which will require a modelled limit in the Plan Change. This makes consistency in establishing and managing nitrogen very important. If an inexperienced person establishes the NRP, there is a risk that the farmer is tied into that NRP and the

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					mitigations to be undertaken in the Farm Environment Plan for the life of their consent under Rule 3.11.5.4. As at January 2017, we have estimated that there would be approximately 93 consultants who have experience and who have completed the advanced course in nutrient management through Massey University. These people will be able to be certified by WRC under the definition requested by DairyNZ. Of course, not all these people are available or able to work as consultants to do NRPs. DairyNZ supports the certificate of nutrient management advisor programme (CNMA). We have estimated that as of January 2017, there are approximately 120 people who have had nutrient management experience and who have completed the intermediate SNM. There are 93 with advanced nutrient management and of these, 39 are CNMA certified.
23	Definitions	Definition of Certified Farm Environment Planner	Oppose, unless amendments made	Alter the definition so that it reads: ***Certified Farm Environment Planner:*** *is a person or entity certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a Certified Farm Environment Planner and has as a*	DairyNZ supports the development of a list of appropriately qualified and experienced people. DairyNZ is concerned that the timeframes set out in Rules 3.11.5.3 and 3.11.5.4 are not achievable unless the Plan Change ensures there is a sufficient pool of certified nutrient advisors and certified farm environment planners to be available to meet the deadlines in rules. If this is the case, then the dates in the FEP are more likely to be achievable. Of most concern to DairyNZ is potentially low numbers of

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				minimum the following qualifications and experience: *a. five years' experience in the management of pastoral, horticulture or arable farm systems; an* *b. completed advanced training or a tertiary qualification in sustainable nutrient management (nitrogen and phosphorus); and* *c. Has either completed training that demonstrates that they are competent to complete the sediment and microbial risk assessments and mitigation identification in Farm Environment Plans, or has experience in soil conservation and sediment management and,* e. *The Chief Executive Officer may limit the Certified Farm Environment Planner to particular farming systems where they have the necessary skills and training to complete Farm Environment Plans.*	people available, given the amount of time needed to go through a risk assessment and complete a Farm Environment Plan. Clause c). All farms must undertake a risk assessment. DairyNZ understands that clause c). is included to ensure that appropriate people are advising mitigations suitable to reduce the risk of sediment, phosphorus, and microbial contaminants. However, DairyNZ is concerned that the definition as written will restrict the pool of people available. If there are very low numbers of people available, the deadlines in the rules are not achievable. There are practical difficulties for the large numbers of drystock, arable and dairy farmers who are classed as priority 1. These people will be required to comply with dates in Rules 3 and 4. The availability of certified FEP planners is particularly problematic for the 75th percentile dairy farmers. FEP development may be more complex for farms the need to make significant nitrogen reductions. This group of farmers will need to be able to access certified people in the latter half of 2019 to complete their FEP to a standard suitable for WRC signoff in 2020 (January for rule 3.11.5.4, July for Rule 3.11.5.3). Clause d). DairyNZ notes that there are dairy farms that are on flat or gently rolling contour. Some of these farms do

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					not have waterways. Therefore, there is likely to be low risk of overland flow of contaminants into waterbodies. When it comes to a risk assessment using Schedule 1, a trained and experienced soil conservator is not necessary. Accordingly, WRC should ensure farmers in this category are not disadvantaged by not being able to access a certified person to do the FEP. WRC should retain the ability to be flexible in the certification process for FEP development on flat or gently rolling farms. Some more guidance in the definition for what is acceptable would be helpful. For instance, the definition could include minimum expectation around training to complete a FEP process e.g. a course that is jointly designed by WRC and relevant industry bodies and organisations.
24	Definitions	75th percentile nitrogen leaching value	Support, subject to amendments	Amend the definition of the "75th percentile nitrogen leaching value" as follows: *The 75th percentile value (units of kg N/ha/year) of all the Nitrogen Reference Point values for dairy farming properties and enterprises within each Freshwater Management Unit and which are received by the Waikato Regional Council by 31 March 2019, as determined by the Chief Executive of the Waikato Regional Council and published on the Waikato*	DairyNZ supports the inclusion of a definition of the 75th percentile value. The addition of a date when will be available from the Council will give more certainty to farmers. By the time the NRP is due to be submitted to the Council, all farmers will know their NRP, but will not know where this sits in relation to others in their Freshwater Management Unit, and therefore whether the requirement impacts them to reduce nitrogen leaching and submit their FEPs by the deadlines in Rules 3.11.5.3 and 3.11.5.4.

	Section of Plan Change	Provision and page number	Support Or Oppose	Decision Sought	Reason for submission
				Regional Council website on or before 30 June 2019.	
	Schedules				
25	Schedules	Schedule B	Support, subject to amendments	Amend Schedule B clauses c). and d). to read as follows: c). The Nitrogen Reference Point must be calculated using the ~~current~~ most recent version of the OVERSEER® model (or any other model approved by the Chief Executive of the Waikato Regional Council). d.) The Nitrogen Reference Point data shall comprise the electronic output file from the OVERSEER or other approved model, and where the OVERSEER Model is used, it must be calculated using the OVERSEER Best Practice Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B Table 1. When a new version of OVERSEER is issued, the Nitrogen Reference Point may be re-calculated using the latest version of that model. This re-calculation should use the same data input file as was used to calculate the first Nitrogen Reference Point in clause a).	DairyNZ support the farmer choice of either 2014/15 or 2015/16 years' data to be used to establish a Nitrogen Reference Point (NRP) in Schedule B. DairyNZ requests that the NRP must be able to be re-calculated as new versions of OVERSEER are released. Provisions to cap or reduce nitrogen leaching in the life of the Plan Change, should allow farm-level innovation, and achieve Objective 4 of the Plan Change. As written, Schedule B is not clear about whether, and how, OVERSEER version changes will be managed. DairyNZ supports the concept of the NRP enabling good information to be established and collated by the Council for the next plan review.
26	Schedules	Schedule 1 b) Page 51	Support, subject to making amendments	Paragraph 2 of Schedule 1 should read: *The Farm Environment Plan shall identify all critical source areas ~~sources of~~*	DairyNZ supports a focus on critical source areas along the paddock edge, as an effective way of minimising diffuse discharge run-off into water.

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				sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants. Amend Schedule 2 b iii) alter the provision to focus on managing critical source areas. The result should be guidance that a 5m cultivation setback from water bodies in low risk areas (for instance flat peat paddocks) is not necessary if critical source areas have been identified and mitigations put in place. Clarify that the Farm Environment Plan provides for alternative mitigations in all cases where it can be shown the alternative mitigation will achieve at least the same reduction of contaminants to water bodies than any standard provided for in the Plan Change.	DairyNZ consider that Schedule 1 could be made more user-friendly by clarifying several matters. As written, paragraph 2 is very general. Taken literally, it would include every source of contaminants on the farm, whether or not they are a risk to waterbodies. For this reason, we consider that it is appropriate and assists plan users to clarify Schedule 1 so that consideration of risk is for critical source areas. We consider that critical source areas are adequately explained in part c) of Schedule 1, so a new definition in the Plan Change is not needed. The Plan Change relies on a tailored approach to ensuring practices on farm adequately mitigate adverse effects and assist in achieve overall reductions in diffuse contaminants in waterbodies. The Plan Change also contains 'blanket requirements' that apply to all farmers and these are useful when they can be justified. However, care should be taken that Schedule 1 does not unnecessarily restrict farmers using practices near waterbodies which have a low risk of overland flow of contaminants.

Submission Ends