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Federated Farmers of New Zealand

Further Submission on Proposed Plan Change 2 to the Horizons One Plan

3 December 2019

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**FURTHER SUBMISSION TO MANAWATU - WHANGANUI (HORIZONS) REGIONAL COUNCIL
ON PROPOSED PLAN CHANGE 2 TO THE HORIZONS ONE PLAN
("PLAN CHANGE 2")**

Form 6

Further submission in support of, or in opposition to, submission on notified proposed plan change
and plan variation

Clause 8 of Schedule 1, Resource Management Act 1991

To: The Chief Executive
Horizons Regional Council
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Manawatu Mail Centre
PALMERSTON NORTH

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This is a further submission in support of, or in opposition to, a submission on a change and variation to Proposed Plan Change 2 (PPC2) to the Horizons One Plan.

1. FFNZ is a person representing a relevant aspect of public interest, including for the reasons set out under headings 1 and 2 on the following pages.
2. FFNZ is a person who has an interest in the proposal that is greater than the interest the general public has, including for the reasons set out in headings 1 and 2 in the following pages.
3. FFNZ could not gain an advantage in trade competition through this further submission.
4. FFNZ wishes to be heard in support of its submissions and further submission.

1. INTRODUCTION

- 1.1 FFNZ welcomes the opportunity to provide further submissions on PPC2.
- 1.2 FFNZ is a pan sector organisation that works with farmers to ensure practical and workable outcomes that add value to its members' farming businesses. Its key strategic outcomes

include the need for New Zealand to provide an economic and social environment within which:

- a. FFNZ's members may operate their business in a fair and flexible commercial environment;
 - b. FFNZ's members, their families and their staff have access to services essential to the needs of the rural community; and
 - c. FFNZ's members adopt responsible management and environmental practices.
- 1.3 As identified in its primary submissions, FFNZ represents members engaged in a wide range of land use activities in the Manawatu-Whanganui Region. This includes dairy farmers, irrigated sheep and beef farmers, and farmers undertaking horticulture, cropping or arable activities, all of which are likely to be affected by the amendments to the One Plan as proposed in PPC2.
- 1.4 Both in the lead up to and following FFNZ's submissions on PPC2, FFNZ has undertaken extensive consultation with its members. This has included public meetings, member advisories, newspaper articles, discussion groups, one on one meetings, and various meetings with Horizons Regional Council and other stakeholders (including DairyNZ, Fonterra, Horticulture NZ, Beef & Lamb NZ, the Foundation for Arable Research, horticulture/vegetable growers, and Horowhenua and Tararua District Councils).
- 1.5 As explained in its primary submission, FFNZ considers that the One Plan's foundation on Land Use Capability ("LUC") as a proxy for natural capital and a basis to allocate nitrogen is fundamentally flawed. In proposing changes to PPC2, FFNZ seeks recognition that Table 14.2 is interim and is not sustainable, or appropriate, beyond the very short term. Amending Table 14.2 might provide a consenting pathway for some unconsented farmers today, but it is not an appropriate basis for a water quality rule, primarily because there is no direct link between Table 14.2 and the desired water quality outcomes.

2. IMPORTANCE OF FARMING AND HORTICULTURE

2.1 Farming, horticulture and primary production activities are important for the social, economic and cultural wellbeing of people and communities in the Manawatu – Whanganui region.

2.2 Broad indicators of the economic importance of primary production (Infometrics 2018) include:

- a market share by industry (agriculture, forestry and fishing) to the region's GDP growth - 18.8%
- over the 10 year period, 2008-2018, the largest contribution to the region's growth (\$54 million of a total \$280 million increase); and
- for every dollar generated by agriculture, an additional 64 cents to the local economy.

2.3 However, agriculture does not just bring economic benefits to the region, it also contributes to the wellbeing of communities and the culture of the region. Farming is the fabric of rural communities.

3. GENERAL COMMENTS

3.1 The further submission process has been an opportunity for parties to understand each other's position and to provide clarity as to their own position. FFNZ has taken the opportunity to understand the submissions of all parties and has attempted to clarify its position.

3.2 FFNZ observes that there is considerable opposition to PPC2, with the majority of submitters expressing concerns about the suitability of PPC2 in delivering the Regional Council's freshwater obligations, whilst also managing the effects on economic, social and cultural wellbeing. There appear to be two key themes in the concerns raised (both of which FFNZ shares):

a. Concerns about consultation:

- (i) Iwi groups have raised concerns about Council's failure to comply with its statutory duties under the RMA and Te Tiriti o Waitangi by not consulting with iwi on PPC2.
- (ii) Submitters have also raised concerns that the Section 32 report incorrectly records that consultation on PPC2 began in August 2018, when it was only consultation on the Table 14.2 CNLMs that were consulted on at this time (this issue has specifically been raised by Iwi submitters but equally applies to consultation with primary industry because all consultation in August 2018 was limited to Table 14.2 and the CNLMs).

b. Concerns about the detail and quality of analysis of the Section 32 report.

3.3 Various submitters propose options for how PPC2 ought to be amended to address their concerns. The main alternatives proposed are:

- a. Withdraw PPC2 and rely on the One Plan without amendment. FFNZ considers that this is not a viable option because it does not provide a consenting pathway for existing intensive farming activities and, as explained in FFNZ's submission, creates significant uncertainty and cost for those farmers and growers e.g. they are unable to borrow, invest or sell their farms.
- b. Adopt an alternative interim approach such as a requirement for intensive farming activities to make a N reduction (e.g. 10% or to the 75th percentile) while a broader and more durable solution is developed through implementation of the NPS-FM. FFNZ supports this option for the reasons set out in its submission.
- c. Encourage Council to redirect resources from PPC2 to collective catchment processes, i.e. Horizons "Our Freshwater Futures" that provide for catchment specific reviews, supported by appropriate stakeholder consultation and the development of regulatory and non-regulatory mechanisms for resource management while also enabling Horizons to

implement the NPS-FM as required. FFNZ agrees that this work ought to be undertaken, however is concerned about the uncertainty (and consequent cost) for existing intensive farming activities that do not have resource consent. Therefore, FFNZ considers that an interim plan change ought to be adopted, to provide a reasonable consenting pathway for these farmers while the wider catchment work is undertaken.

3.4 FFNZ's detailed response in respect of these, and all proposals made in the submissions, is set out in the tables contained in Section 4 of this further submission.

3.5 While there are some similarities between parts of many other submitters' proposals and FFNZ's proposal, FFNZ considers that its proposed framework deals with the concerns in a more robust and comprehensive way that recognises the inherent flaws in any nitrogen allocation approach based on LUC.

3.6 In its submission on PPC2, FFNZ proposed an appropriate water quality rule to manage existing intensive farming activities in targeted water management sub-zones that achieves the desired environmental outcomes, provides certainty for existing farmers, is able to be implemented, while recognising that work is still to come to implement the NPS-FM.

3.7 In most parts of this further submission, FFNZ's views are contingent on other changes being made as proposed in FFNZ's submission on PPC2. In this sense, FFNZ's submission on PPC2 needs to be seen as a package and FFNZ's view on a particular provision cannot (and should not) be viewed in isolation.

4. SPECIFIC COMMENTS

4.1 The table on the following pages sets out the particulars of the original submitter, the provision to which their submission point relates, the relief they seek, whether FFNZ supports or opposes the submission (in whole or in part), and the reasons for FFNZ's position. The table has been organised by provision, as opposed to submitter.

4.2 In terms of decisions sought, FFNZ seeks that the submission points are allowed to the extent that they are supported in this further submission and that they are disallowed to the extent that they are opposed in this further submission.

4.3 FFNZ also seeks any consequential changes necessary to give effect to the relief sought or to address the concerns raised in this further submission.

5. FURTHER SUBMISSION SPECIFICS

Submitter Name and Submission Number	Relevant Provision	Relief sought by submitter (edit shown with <u>strike</u> through (proposed deletion) and <u>underline</u> (proposed addition))	Support or oppose	Reasons
HortNZ (66)	Policy 5-7 Land use water activities affecting groundwater and surface water quality	<p>The submitter seeks the addition of an additional clause:</p> <p>(bb) Recognise the particular domestic food production values associated with commercial vegetable growing and provide a tailored consenting pathway to manage associated effects.</p>	Oppose	<p>FFNZ considers that there is no scope to consider Policy 5.7 because it was not part of PC2 as notified. FFNZ also considers that it is not appropriate to provide for one primary industry and not others (particularly in the absence of national, regional or other guidance or higher order documents justifying this approach).</p> <p>FFNZ is very concerned that the effect of the proposal is that a regime is created where one sector can increase intensity without consideration of nitrogen discharges whereas other sectors are required to significantly reduce nitrogen discharges (with, FFNZ says, no consideration of the water quality outcomes or social and economic cost).</p>
Water Protection Society (65)	Policy 5-8 Management and regulation of intensive farming land use activities affecting groundwater and surface water quality	<p>Provision title and introductory sentence of Policy 5-7</p> <p>Support amendment to title and addition of introductory sentence.</p>	Support	<p>FFNZ submitted in support of the change to the heading and inclusion of an introductory sentence to the Policy.</p> <p>The addition of 'management' provides for a range of actions, regulatory and non-regulatory.</p> <p>The new introductory sentence recognises that Policy 5-7 is the driver of the actions and that it is the management of intensive farming activities, that is the focus of Plan Change 2.</p>
Water Protection Society (65)	Inclusion of a new clause (a) - notified as clause (d) (and subsequent re-labelling as proposed)	Seeks the inclusion of a new clause (a) which states (a) All intensive farming land use activities must be regulated to manage nutrient leaching and run-off, faecal contamination, and sediment losses in accordance with <u>good management practices</u> .	Oppose	<p>While FFNZ supports the adoption of a policy and rule framework based on GMP, FFNZ does not support the proposal that this is to be solely achieved through regulation as it will encompass a wider range of actions (regulatory and non-regulatory). Therefore, in its submission FFNZ opposed paragraph (d) and it opposes this submitters request to remove paragraph (d) to (a).</p>

Submitter Name and Submission Number	Relevant Provision	Relief sought by submitter (edits shown with strikethrough (proposed deletion) and underline (proposed addition))	Support or oppose	Reasons
Water Protection Society (65)	Policy 5-8(a)(i)(A)	WPS seeks an amendment to Policy 5-8(a)(i)(A), specifically (A) Take into account all non-point and point sources of nitrogen contamination of ground and surface water in the catchment.	Oppose	In principle, FFNZ agrees that all sources of contaminants and water quality issues in a sub-catchment, catchment and FMU ought to be considered (this would include diffuse, point source and other sources of contaminants). However, on the basis that PPC2 is an interim plan change prior to the community led catchment work to implement the NPS-FM, and on the basis that the One Plan contains other rules that relate to point source discharges, FFNZ opposes the proposed amendment to Policy 5-8(a)(i)(A) and considers that the inclusion of point source discharges could more appropriately be consented in a sub-catchment or FMU planning approach to implement the NPS-FM.
Ngati Turanga (67), Te Roopu Taiao o Ngati Whakatere Trust (68), Te Runanga o Raukawa (70)	Policy 5-8(a)(i)(B)	These submitters do not support deleting Policy 5-8(i)(B) and seek that it to be retained.	Oppose	FFNZ does not support retaining Policy 5-8(i)(B). The nitrogen leaching maximums will not achieve the strategies of Policies 5-2, 5-3, 5-4 and 5-5 which require the Schedule E targets to be met (irrespective of the size of the gap between current state and target state).
Water Protection Society (65)	Policy 5-8(a)(i)(B)	WPS does not support deleting Policy 5-8(i)(B) and seeks it to be retained, however with the following amendments (B) will together with other aspects of this Policy, achieve the <u>strategies</u> goals for surface water quality set out in Policies 5-2 5-3(a), 5-4(a) and 5-5(a), and the strategy goal for groundwater quality set out in Policy 5-6(a).	Oppose	FFNZ does not support retaining Policy 5-8(i)(B), or the amendments this submitter proposes. The nitrogen leaching maximums will not achieve the strategies of Policies 5-2, 5-3, 5-4 and 5-5 which require the Schedule E targets to be met (irrespective of the size of the gap between current state and target state). It is not realistic nor correct to say that the CNLMs in the One Plan, or PPC2 will achieve these target states.
Water Protection Society (65)	Policy 5-8(a)(i)(E) PPC2 – clause (D)	WPS does not support the change proposed to Policy 5-8(a)(i)(E) and instead seeks the following (E) provide for appropriate timeframes for achievement-leaching to be decreased sufficiently to achieve the nitrogen leaching	Oppose	FFNZ supports the amendment to (D) as proposed in PPC2, as it is important that there are appropriate timeframes for achieving the CNLMs (but at the same time it needs to be recognised that PPC2 is an interim plan change and that Council still has to implement the NPS-FM).

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		<p><u>maximums established under this Policy, if they are not already met. The time allowed to meet the nitrogen leaching maximums will be determined by the practicality, complexity and cost of modifying farm practice to do so, but in no case will exceed 10 years.</u></p> <p><u>Proposals for decreasing leaching to below the established maximums over more than 3 years will require milestones to be specified and achieved.</u></p>		<p>FFNZ does not support the submitter's proposal to specify the time limits or to require farms to achieve the nitrogen leaching maximums. The timeframes will depend on the specific situations and, as explained in FFNZ's primary submission, FFNZ does not support a requirement for all intensive farming activities to achieve Table 14.2. It considers that a viable alternative pathway, as set out in its submission, ought to be provided and that this appropriately recognises that the lack of relationship between LUC and N leaching and water quality outcomes.</p>
Water Protection Society (65)	Policy 5-8(a)(ii)	<p>WPS supports the provision for exceptions for meeting the CNLMs, however seeks the following amendments:</p> <p>(ii) Existing intensive farming land use activities must be regulated in targeted Water Management sub-zones to achieve the nitrogen leaching maximums specified established in under (i) <u>within the timeframes established under (i)(E)</u> except as provided for in (iia) and (iib) below.</p>	Oppose	<p>FFNZ does not support a proposal that all intensive farming activities must achieve the nitrogen leaching maximums or that the timeframes ought to be set as proposed by this submitter in paragraph 5-8(a)(i).</p> <p>FFNZ considers that an alternative consenting pathway ought to be provided (as proposed in its submission, particularly an alternative controlled activity rule) and therefore Policy 5-8(a)(ii) ought to be amended to clarify that (i) only applies to those consents granted pursuant to Table 14.2. This clarification provides for the additional paragraph (iia) as sought in the FFNZ submission.</p>
Water Protection Society (65)	Policy 5-8(a)(iia)	<p>WPS requests that Policy 5-8(a)(iia) is amended as follows:</p> <p>(iia) Existing intensive farming land use activities which do not comply with <u>(ii)-the nitrogen leaching maximums established under (i) within 5 years</u> must be regulated to reduce nitrogen leaching which is in-excess of the nitrogen leaching maximums established under (a) by implementing good management practice, and additional measures sufficiently to achieve the nitrogen</p>	Oppose	<p>In its primary submission, FFNZ proposed changes to paragraph (iia) to provide for a reasonable discretionary activity consenting pathway for those farmers who cannot reduce to the CNLMs (before 2023) or who cannot make a 10% reduction or reduce to the 75th percentile (as provided for in the additional clause (iia) as proposed by FFNZ).</p> <p>FFNZ considers that a focus on the degree to which the CNLMs are exceeded will not help to achieve the water quality objectives (or provide a reasonable and appropriate consenting pathway for farmers) for reasons including that there is no relationship between the CNLMs and water</p>

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		<u>leaching maximums within 10 years by implementing additional measures.</u>		<p>quality. Further, the degree by which the CNLMs are exceeded will be driven by many factors including those that are outside a farmer's control (such as changes to Overseer version which result in increases in estimated or modelled N leaching for no change to the farm system).</p> <p>Accordingly, FFNZ opposes this submitter's proposal to focus on the CNLMs and to require reductions within a 10 year timeframe (which is both arbitrary and not supported by a s32 assessment).</p>
Ngati Turanga (67), Te Roopu Taiao o Ngati Whakatere Trust (68), Te Runanga o Raukawa (70)	Policy 5-8 (a)(iia)	<p>These submitters request that Policy 5-8(a)(iia) is amended as follows:</p> <p>(iia) Existing intensive land use activities which do not comply with (ii) must be regulated to <u>significantly</u> reduce nitrogen leaching which is in excess of the nitrogen leaching maximums established under (a) by implementing good management practice, and <u>additional</u> measures to minimise the extent degree of non-compliance having regard to: ...</p>	Oppose	<p>For the reasons provided in response to the WPS submission to Policy 5-8(a)(iia), FFNZ does not support the proposed amendments, which would have the effect of requiring significant nitrogen reductions to CNLMs that do not relate to nitrogen leaching or water quality objectives. They would also impose significant cost and effectively provide no way forward for many existing dairy and horticulture farmers (and potentially some intensive drystock farms).</p>
Ngati Turanga (67), Te Roopu Taiao o Ngati Whakatere Trust (68), Te Runanga o Raukawa (70)	Policy 5-8 (a)(iia) (A)	<p>These submitters request that Policy 5-8(a)(iia)(A) is amended as follows:</p> <p>(A) the feasibility, practicality and <u>financial implications</u> cost of achieving the nitrogen leaching maximums specified in (i) <u>were they to be achieved</u></p>	Oppose	<p>It is not clear to FFNZ what the intention of this amendment is. If the intention is that the CNLMs have to be achieved in order for the financial implications to be taken into account, FFNZ would oppose such a proposal as that defeats the purpose of this paragraph. FFNZ also considers that significant amendments are needed to paragraph (iia) as set out in its submission (none of which are addressed by these submitters). On that basis, even if the intention is to simply replace "cost" with "financial implications", FFNZ opposes this submission.</p>
Water Protection Society (65)	Policy 5-8(a)(iib)	WPS requests that Policy 5-8 (a)(iib) is amended as follows:	Oppose	FFNZ does not support the proposal to require existing intensive farming activities to transition to alternative non

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		Existing <u>intensive</u> farming land use activities which do not comply with (ii) but are intended to transition to an alternative non-intensive farming land use within 5 years must be regulated to ensure that they are able to continue for a limited period of time in order to enable that transition and only where there is no increase in the exceedance of the nitrogen leaching maximums established under (a).		intensive farming land uses within five years. As explained in FFNZ's primary submission, the nitrogen reductions required are not realistic, nor is a short timeframe of five years. Further, the CNLMs are arbitrary and do not reflect nitrogen leaching and water quality outcomes.
Ngati Turanga (67), Te Roopu Taiao o Ngati Whakatere Trust (68), Te Runanga o Raukawa (70)	Policy 5-8 (a)(iib)	The submission states that Policy 5-8(a)(iib) effectively grandfathered existing exceedances during the transitional period. The relief sought is as follows: Existing land use activities which do not comply with (ii) but can demonstrate a <u>intended to</u> transition to an alternative non-intensive farming land use must be regulated to ensure that they are able to continue for a limited period of time in order to enable that transition. <u>For the avoidance of doubt, subclause (iia) applies to transition farms so as to avoid grandfathering over the transitional period, and only where there is no increase in the exceedance of the nitrogen leaching maximums established under (a)</u>	Oppose	<p>It is not clear to FFNZ what the intention of these amendments are. If the intention is to require reductions in N leaching from these farms during the transition period, then FFNZ opposes the proposal and considers that the transition period ought to provide for them to reduce at whatever stage suits the individual farm, even if that is at the end of the transition period.</p> <p>If the intention is for these farms to increase during the transition period, the rationale is not clear and while there might in theory be a justification for this, FFNZ cannot form a view without understanding the reasons and implications.</p>
Water Protection Society (65)	Policy 5-8(a)(iiv) – new clause proposed	WPS requests the addition of the following clause: <u>(iv) All existing intensive farming land use activities must comply with the nitrogen leaching maximums established under (i) within 10 years.</u>	Oppose	As explained in FFNZ's primary submission, FFNZ does not support the LUC approach or the requirement for farms to comply with the CNLMs. This is for reasons including that there is no relationship between LUC and N leaching and the water quality outcomes sought, and many farms cannot meet the CNLMs. Requiring farms to achieve the CNLMs and to do this in a 10 year period would impose significant economic

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		<u>For the avoidance of doubt, any existing intensive farming land uses which do not comply with the nitrogen leaching maximums established under (i) within 10 years are prohibited activities.</u> This proposed clause is to set a deadline for compliance with the N leaching limits and to make it absolutely clear what the status of any intensive farming land use activity that fails to do so is. This is to avoid the uncertainty as to how to deal to such activity that has existed to date. It also provides a strong incentive for land uses to apply.		cost and social hardship. In addition, it is unlikely to achieve the desired environmental outcomes. FFNZ strongly opposes the proposal to make farming activities that cannot meet the CNLMs prohibited and considers that a reasonable consenting pathway ought to be provided for those farmers (as set out in FFNZ's submission).
Water Protection Society (65)	Policy 5-8(b)(i)	WPS requests that 'amongst other things' be deleted from Policy 5-8 (b)(i)	Support in part	FFNZ agrees that the words "amongst other things" could be deleted from Policy 5-8(b)(i) and that this would potentially create greater certainty for farmers and plan users as to actions required in relation to faecal contamination. However, it considers that the words "where practicable" need to be added to this paragraph as proposed in FFNZ's primary submission, for the reasons as provided in the submission.
Water Protection Society (65)	Policy 5-8(b)(i)(B)	WPS requests that Policy 5-8(b)(i)(B) be replaced by 'mitigate faecal contamination of surface water from other entry points (e.g. faecal run off from races, stand off pads and paddocks)'	Oppose	FFNZ agrees that providing examples of entry points for faecal contamination may be helpful. However, FFNZ does not consider it appropriate to include paddocks and considers it ought to be limited to activities where effluent accumulates, such as run off from races.
Water Protection Society (65)	Policy 5-8(b)(i)(C)	WPS requests that Policy 5-8(b)(i)(C) be deleted.	Oppose	FFNZ considers that it is important that an appropriate plan that is tailored and prioritised is adopted to provide a reasonable transition and pathway for farmers to implement actions to reduce faecal contamination. Therefore, it opposes the proposal to delete paragraph (C).

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Water Protection Society (65)	Policy 5-8(c)(i)	<p>WPS seeks the following amendment to Policy 5-8 (c)(i)</p> <p>In those Water Management Subzones where agricultural land use activities are the predominant cause of elevated sediment levels in surface water, the Regional Council will <u>promote require</u> the preparation and implementation of <u>voluntary</u> management plans under the Council's Sustainable Land Use Initiative or Whanganui Catchment Strategy for the purpose of reducing the risk of accelerated erosion as described in Chapter 4.</p>	Oppose	<p>FFNZ does not consider PPC2, as an interim plan change, to be the appropriate time for the consideration of mandatory SLUI (or other) plans. Council still has to implement the NPS-FM and it is at this time that the merits or otherwise of mandatory vs voluntary regulatory approaches to matters such as sediment control should be considered.</p> <p>FFNZ supports maintaining these plans as voluntary actions and therefore opposes the proposed amendment to Policy 5-8(c)(i)</p>
Environmental Defence Society (54) and Wellington Fish and Game Council (55)	Policy 5.8 (a)(iiia), (a)(ii) and d(i)	<p>Both of these submitters seek the following:</p> <ul style="list-style-type: none"> - Delete paragraph (a)(iiia) and delete the words "(iiia) and" from paragraph (a)(ii) - Insert 'as a minimum' to the end of paragraph (d)(i). 	Oppose	<p>As explained above, and in FFNZ's submission, FFNZ does not support the LUC approach and does not support an approach that does not provide a viable pathway for those activities that cannot meet the CNL/Ms in Table 14.2. FFNZ considers that amendment to paragraph (iiia) is needed to ensure the pathway is appropriate and considers that this paragraph ought to be retained (with amendments as proposed in its submission). Therefore, FFNZ opposes these submitters' proposal to delete paragraph (iiia) and all references to it.</p> <p>In respect of paragraph (d)(i), FFNZ opposes the addition of the words "at a minimum". In its submission, FFNZ raised concerns about the use of the words "must be managed" (FFNZ considers that the words "must be managed" is more appropriate) and considers that the addition of "at a minimum" only serves to make the regulatory approach more stringent and fails to take into account the array of mitigation and management responses, regulatory and non regulatory; and at a variety of spatial scales e.g. individual property, multiple properties, sub-catchment, FMU etc.</p>

Submitter Name and Submission Number	Relevant Provision	Relief sought by submitter (edit shown with strikethrough (proposed deletion) and underline (proposed addition))	Support or oppose	Reasons
Director General of Conservation (61)	Policy 5.8	<p>The submitter opposes the proposed amendments to Policy 5.8 and seeks the retention of Policy 5.8 as contained in the One Plan, and/or seeks:</p> <ul style="list-style-type: none"> - Amend paragraph (a)(iia) to provide direction on what degree of GMP is necessary, and what level of nitrogen reduction is acceptable, and how costs are balanced with environmental outcomes. - Amend paragraph (iib) to clearly direct the process steps and timeframes for the implementation of this policy. 	Oppose	<p>FFNZ considers that amendments to Policy 5.8 are required to ensure a viable and appropriate consenting pathway for existing intensive farming activities and therefore does not support the proposal to retain Policy 5.8 as contained in the One Plan.</p> <p>FFNZ considers that for farmers relying on GMP under the discretionary activity pathway, there should not be a requirement to provide direction on the degree of GMP or N reduction. FFNZ considers that guidance as to N reduction can be provided for the controlled activity pathway FFNZ proposes but that for a discretionary activity, the degree of N reduction should not be specified.</p> <p>FFNZ considers that PPC2 ought to be interim while the wider catchment and NPS-FM implementation work is undertaken. Therefore, FFNZ considers it premature and inappropriate to direct the process steps and timeframes in Policy 5.8 or in PPC2.</p>
Hort NZ (66)	Policy 5-8 and proposed new Policy 5-8A	<p>The submitter seeks the exclusion of commercial vegetable growing from this policy and proposes the following relief:</p> <ul style="list-style-type: none"> - Policy title, introductory sentence and (iib) – addition of <u>'excluding commercial vegetable growing'</u> - The inclusion of a new Policy 5-8A – Management and regulation of commercial vegetable growing activities 	Oppose in part	<p>FFNZ understands the concerns raised by this submitter about the characteristics of commercial vegetable growing activities and associated constraints. However, FFNZ considers that the management of nitrogen should be effects based with all sectors doing their part. It does not support a regime where the nitrogen discharges from one sector are not considered (and that sector is able to intensify without considering effects) while other sectors are required to make significant nitrogen reductions (and associated significant farm system or land use change) without consideration of environmental, economic and social effects.</p> <p>In principle, FFNZ would support amendments to Policy 5-8 where appropriate to recognise the nature of horticulture activities, and FFNZ supports the adoption of GMP, but it is</p>

Submitter Name and Submission Number	Relevant Provision	Relief sought by submitter (edit shown with strikethrough (proposed deletion) and underline (proposed addition))	Support or oppose	Reasons
		concerned that Policy 5-8A goes too far beyond just the characteristics of these activities and GMP, and inappropriately does not provide for nitrogen reductions or mitigations or improvements to water quality.		
Potatoes NZ (75)	New Policy 5-8A And amendment to Policy 5-8 (a)(i) (B) and (C)	The submitter seeks the inclusion of a new Policy 5-8A to provide direction for the moment of commercial vegetable production within areas defined as high productive land. The submitter also seeks the inclusion of commercial vegetable growing areas to (a)(i)(B)(C)	Oppose in part	FFNZ understands the specific issues that arise for commercial vegetable growing activities from the need to provide for crop rotation. In principle, FFNZ agrees that this could be better recognised in PPC2. However, FFNZ does not support the proposed new Policy 5-8A because it appears to go beyond that to provide a regime where nitrogen reductions are maintained at a level as opposed to managed and/or reduced. FFNZ repeats the concerns expressed above about all sectors needing to do their part to achieve the water quality objectives (whilst recognising the issues and challenges that may affect sectors and may affect them to different degrees or in different ways).
BLNZ (74)	Policy 5-8 (a)(i)(C), (a)(ii), (a)(iia)(A) and (B), (a)(iib), (d)	The submitter seeks the following amendments to Policy 5-8: <ul style="list-style-type: none"> - (a)(i)(C) are achievable on most farms using <u>good management practice</u> <u>good farming practice principles</u> - (a)(i) numbering of exemptions is amended pending changes to (iia) and (iib) <ul style="list-style-type: none"> - (a)(iia)(A) Amend as follows ...by implementing <u>good management practice</u> <u>good farming practice principles</u> and additional measures to minimise the degree of non-compliance become compliant over time having regard to: 	Oppose	In principle (and based on FFNZ's understanding of the GFP principles), FFNZ considers there is no meaningful difference between "GMP" and "GFP". It notes that both approaches have been used in other regions. Given that PPC2 is an interim plan change, the definition of GMP that is proposed and that GMP was previously used in the One Plan, FFNZ's preference is for GMP. <p>FFNZ does not support the proposed amendments to require farmers to use GFP to become compliant with CNLMs or to have regard to LUC. FFNZ considers that there is no relationship between LUC and N leaching or the water quality objectives. FFNZ considers that there is likewise no relationship between GFP actions and LUC or the CNLMs.</p> <p>FFNZ considers that a fundamental review of the allocation framework is required, that PPC2 is interim and that in the interim a reasonable and appropriate consenting pathway</p>

Submitter Name and Submission Number	Relevant Provision	Relief sought by submitter (edit shown with strikethrough (proposed deletion) and underline (proposed addition))	Support or oppose	Reasons
		<p>(A) The feasibility, practicality and cost of achieving the nitrogen leaching maximums specified in (i); and best practicable options towards achieving policies 5-1 and 5-2.</p> <p>(B) <u>The Land Use Classification of the property and its relation to Table 14.2</u></p> <p>- (d) change the definition of GMP</p>		<p>ought to be provided (as set out in FFNZ's submission) as opposed to reinforcing or relying on the flawed LUC approach and CNLMs.</p>
Ravensdown (45)	Policy 5-8 (a) (d)	<p>The submitter seeks the following amendments to Policy 5-8:</p> <ul style="list-style-type: none"> - (a)(iiia) ... and additional measures to minimise nitrogen leaching the degree of noncompliance, having regard to: (A) The feasibility, practicality, and cost of achieving the nitrogen leaching reductions maximums specified in (i) - (a)(iib) ... and only where there is no increase in the exceedance of the nitrogen leaching losses from the existing land use activity maximums established under (a) - (d) Good management practices. (i) All intensive farming land use activities must be regulated to manage... 	<p>Support in part</p> <p>Oppose in part</p>	<p>In principle, FFNZ supports amendments to remove reference to the CNLMs or the focus on these nitrogen levels. FFNZ also supports a focus on managing nitrogen leaching as opposed to solely regulating it.</p> <p>However, FFNZ considers that an implication of the proposed amendments is that the focus is on "minimising" nitrogen leaching (and this may not be what is intended). FFNZ does not support such an approach and considers that is not the intent of PPC2 or Policy 5-8 (which is instead on reasonable, practical and affordable options to reduce N leaching having regard to GMP and BPO).</p> <p>FFNZ does not support the amendments to paragraph (a)(iib) because it considers that a more fundamental change to the management regime is required as proposed in its primary submission.</p>
Nga Waihau o Paerangi Trust (63)	Policy 5.8 – introductory clause, (a)(B), E, (a)(ii) and clauses (iia) and (iib), (d)	<p>The submitter seeks the following amendments to Policy 5-8:</p> <ul style="list-style-type: none"> - Introductory clause – replace Policy 5.7 with Policies 5-2, 5-3, 5-4, 5-5 and 5-6 - (a)(B) – retain operative wording - (a)(E) – retain operative wording 	Oppose	<p>FFNZ considers that amendments to Policy 5.8 are required to ensure a viable and appropriate consenting pathway for existing intensive farming activities and therefore does not support the proposal to retain Policy 5.8 as contained in the One Plan.</p>

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		<ul style="list-style-type: none"> - (a)(ii) – delete reference to exceptions - (iia) and (iib) - (iia) and (iib) – delete new clauses - (d) – delete new clause 		
Method 5-12 Innovative land use research	Method 5-12	<p>The proposed wording does not integrate the needs of tangata whenua, and fails to place Te Ao Maori at the centre of the research. Amendments are proposed as follows:</p> <p>Description: Support initiatives by local communities <u>and</u> sector groups <u>or</u> in consultation with tangata whenua...</p> <p>Who: Local communities <u>including</u> tangata whenua, rural...</p> <p>Target: Advice and assistance is available for landowners <u>and</u> Maori in the Region regarding land use management practices.</p>	Oppose in part	<p>FFNZ does not support the requirement for local communities and sector groups to consult with tangata whenua in developing options. FFNZ supports the intention in the provision as notified, which was that local communities, sector groups or tangata whenua would propose initiatives and the regional council could support these. This does not preclude any obligations the council has to consult with tangata whenua or other arrangements with tangata whenua.</p> <p>FFNZ has no issue with the proposal to add the words "including tangata whenua" to the "who" row of the table or to add the words "Maori" (but considers that this is unnecessary because Maori would be included in the term "landowners").</p>
Hort NZ (66)	Method 5-12	<p>The submitter seeks amendments to the text of Method 5-12 as follows:</p> <ul style="list-style-type: none"> - Description: „, in order to find viable options for intensive-farming land users to make improvements to water quality to contribute to achieving water quality targets over time. That will have difficulty in achieving the cumulative-nitrogen leaching-maximums (refer Table 4-1).- - Links to Policy – include reference to new Policy 5-8(A) as proposed 	<p>Support in part</p> <p>Oppose in part</p>	<p>In principle, FFNZ considers that there may be merit in consideration of initiatives for any land users to improve water quality (not just intensive farming activities). However, FFNZ is concerned about the potential resource drain on Council and that a focus on intensive farming activities would recognise that they have been prioritised in PPC2, at least in the interim while the wider sub-catchment work is undertaken. FFNZ also considers that amendments are needed to Method 5-12 to recognise that the solutions need to be financially viable (as proposed in its submission).</p> <p>FFNZ does not support the reference to the new Policy 5-8A for reasons set out above in response to this submission point.</p>

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Ravensdown (45)	Method 5-12 - Description	The submitter seeks the following amendments to the Description of Method 5-12 ... where nitrogen leaching is an issue as identified in Table 14.1, will be a priority in order to find viable options for intensive farming land users to sustainably reduce nitrogen leaching from their farming activities that will have difficulty in achieving the cumulative nitrogen leaching maximums (refer Table 14.1)	Support in part	FFNZ agrees that reference should be made to Table 14.1 to identify the WMSZ that are the issue. FFNZ also considers that there ought to be a focus on financially and practically viable options to reduce nitrogen leaching and if that is what is intended by “sustainably reduce” then FFNZ would support it.
Method 5-13 Provision of information	Method 5-13	Similarly with Method 5-12, the submitters seek the following amendments: Description: (additional sentence) Horizons <u>will serve copies of all reports published under this method to tangata whenua within the rohe to which the research applies.</u> Who: Regional Council, <u>tangata whenua, rural sector....</u>	Support in part	In principle, FFNZ has no issue with the requirement for Council to serve copies of reports on tangata whenua but considers that this is an issue between the Council and tangata whenua.
BLNZ (74)	Method 5-13 - Target	The submitter asks that the last sentence which reads –“Horizons will consider whether it needs to respond to changes in Overseer through a plan change process” is deleted.	Oppose in part	FFNZ does not agree with this submitter that all contingencies ought to be provided for in PPC2 (as it is an interim plan change). It does agree that the wording needs to be amended and prefers its amended working, which specifically requires council to consider a methodology to update the CNLMs as Overseer version changes.
Balance (72)	Method 5-13 – Target. Additional bullet	The submitter seeks the following additional bullet point be added to the ‘Target’ section of Method 5-13: “The assessment criteria for nutrient management models appropriate for	Support	FFNZ supports the text inclusion as it aides transparency.

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Ravensdown (45)	Method 5-13 – Amendment to Description	The submitter seeks the deletion of ‘version changes’ from the Overseer reference. use in intensive farming are published on Horizons website”	Oppose in part	While FFNZ agrees in principle that the information Council makes available about Overseer could be usefully broader than just Overseer version change (including how mitigations outside Overseer could be recognised), FFNZ considers that there needs to be a specific focus on version changes and this needs to be addressed. FFNZ would prefer wording along the lines of “ ... Overseer, <u>including</u> version changes ...”
Ngati Turanga (67), Te Roopu Taiao o Ngati Whakatere Trust (68), Te Runanga o Raukawa (70)	Policy 14-3 Good Management Practices	Policy 14-3	Oppose	FFNZ supports the addition of GMP and has supported in part (subject to amendments as proposed) Policy 14-3. FFNZ supports an approach to the management of nitrogen and other diffuse discharges or contaminants associated with farming activities that is based on good management practice.
Nga Waihua O Paerangi Trust (63)	Policy 14-3	The submitter asks that all proposed changes to operative Policy 14-3 are rejected. Relief is provided however, to amend the Operative Policy 14-3 as follows: The standards (including good management practices guidelines and codes of practice), recognising that such industry based standards generally represent current best practice, and may accept compliance with those standards as being adequate to avoid, remedy or mitigate adverse effects to the extent that those standards address the matters in Policies 14-1, 14-2, 14-4 and 14-5.	Oppose	FFNZ does not support the retention of the operative version of Policy 14-3 or the amendment to that to include GMP. FFNZ considers that a reasonable consenting pathway needs to be provided without reference to the CNLMs and refers to the reasoning elsewhere in this submission and in FFNZ’s primary submission.
Environmental Defence Society (54) and	Policy 14.3	The submitter seeks the deletion of the proposed changes to Policy 14-3 in favour of retaining the operative Policy wording.	Oppose	FFNZ does not support the retention of Policy 14.3 as contained in the One Plan. FFNZ considers that Policy 14.3 needs to be amended as proposed in PPC2 (and in conjunction with other amendments in FFNZ’s submission) in order to provide an appropriate consenting pathway for existing intensive farming activities.
		These submitters seeks the reinstatement of following parts of the pre-PPC2 wording of	Oppose	FFNZ does not support the retention of Policy 14.3 as contained in the One Plan and the proposed addition of “including good management practices” do not address its

Submitter Name and Submission Number	Relevant Provision <i>(edits shown with strikethrough (proposed deletion) and underline (proposed addition))</i>	Relief sought by submitter <i>(edits shown with strikethrough (proposed deletion) and underline (proposed addition))</i>	Support or oppose	Reasons
Wellington Fish and Game Council (55)	Policy 14.3 with the inclusion of the words that are underlined: “The Regional Council will examine on an ongoing basis relevant industry based standards including good management practices ...”			concerns. FFNZ considers that Policy 14.3 needs to be amended as proposed in PPC2 (and in conjunction with other amendments in FFNZ's submission) in order to provide an appropriate consenting pathway for existing intensive farming activities.
Hort NZ (66)	Policy 14-3 and inclusion of new Policy 14-x	The submitter seeks changes to Policy 14-3 to refer to a new Policy 14-x. Policy 14-x sets out how the submitter considers that commercial vegetable growing activities ought to be managed. This includes: <ul style="list-style-type: none">- Enabling commercial vegetable growing activities where discharges of the four contaminants is within 2019 levels and subject to GMP.- Adopting sector based initiatives to progressively reduce losses of the four contaminants.- Establishing baselines based on the five years prior to 2019.- Providing an area of land for commercial vegetable growing to ensure the expansion of the activities is in a location which is LUC 1 and 2 land and outside the areas in Table 14.1.- Incentivise growers to reduce intensity in the areas in Table 14.1 where this is in a different FMU.- Provide for consideration of offsets	Oppose in part	FFNZ understands the submitter's concerns about the nature of commercial vegetable growing activities and the associated challenges and constraints. FFNZ can see the logic in trying to provide for things like allowing commercial vegetable growing to establish a baseline and providing for crop rotation. However, FFNZ does not agree that Policy 14-x appropriately provides for these issues and is concerned about the implications e.g. if commercial vegetable growing activities can maintain 2019 discharges, will that mean that other activities have to reduce by more? What will the implications be for water quality? FFNZ considers that everyone should play their part and understands that that may look different for different sectors or activities, but considers that it must also be equitable and proportionate. It opposes Policy 14-x because it does not consider that it achieves this. In principle, FFNZ supports incentivising activities to relocate to sub-catchments or locations where this will result in water quality improvements and not cause other adverse effects. However, FFNZ has concerns about how this happens and about adopting 2019 as the baseline (six years after the One Plan became operative for horticulture). There is an additional equity issues with other sectors and activities that are not given the same provisions or opportunities as proposed in Policy 14-x.

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				Also, in principle, FFNZ supports an approach that considers all contaminants and that considers offsets. However, FFNZ is concerned that everyone should play their part in improving water quality and everyone should have access to the same opportunities.
Woodhaven Gardens (57)	Additional Policy – Commercial Vegetable Growing	The submitter proposes that a new policy be included for Commercial Vegetable Growing to provide a separate rule regime for this activity. It uses a policy from the Canterbury Land and Water Plan as an example.	Support in part Oppose in part	In its submission, FFNZ attempted to design a regime where activities would be required to make a proportionate step towards nitrogen reductions. While it is willing to consider alternative ways of achieving those objectives, on the basis of its current understanding of this submitter's proposal, FFNZ considers that its regime better achieves this.
Potatoes NZ (75)	Additional Policies	The submitter proposes that new policies 14-5A and 14-6A be included for Commercial Vegetable Growing. These policies essentially require commercial vegetable	Support in part	It is not clear from the submission whether a new policy is sought like Policy 14-x sought by Horticulture New Zealand, or whether the policy sought is that commercial vegetable growing activities operate at GMP, obtain a NMP and maintain a baseline set for the area. If the intention is that a policy like that sought by Horticulture New Zealand is adopted, FFNZ opposes the submission. If the intention is that a policy is sought that achieves the same or similar outcome as what is proposed in FFNZ's submission for intensive farming activities, then FFNZ would support the submission. However, FFNZ considers that more is required than adherence to a baseline for an area if that baseline is set on the basis of the extent of the activity in 2019 and that is significantly different from 2013 (particularly when there is an expectation that other activities reduce below their 2013 baseline).

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		<p>growing activities to be managed to a baseline or to a new CNLM table or in accordance with an alternative decision support tool, adopt GMP and a pathway for transition or reductions is provided for.</p>	Oppose in part	<p>growing e.g. crop rotation and issues with Overseer estimating or modelling nitrogen for some activities.</p> <p>In principle, FFNZ supports an approach that is tailored and achieves the same proportionate outcome and effects based approach as what FFNZ proposes in its primary submission, with each sector or activity doing their bit. To the extent that this is what the submission achieves, FFNZ would support the approach.</p> <p>However, to the extent that this is not what is intended, and the effect is that other sectors or activities will have to make greater reductions in the future as a consequence or water quality outcomes will not be achieved or one sector will make an windfall gain at the expense of another, FFNZ does not support the submission.</p>
BLNZ (74)	Reference to GMP	<p>The submitter seeks to change the definition of GMP and therefore the reference in the Policy 14.3 from GMP to good farming practice principles.</p> <p>The submitter also seeks the addition of the following sentence to the end of Policy 14.3 and contribute to meeting the targets contained in schedule E.</p>	Oppose	<p>In principle (and based on FFNZ's understanding of the GFP principles), FFNZ considers there is no meaningful difference between "GMP" and "GFP". It notes that both approaches have been used in other regions. Given that PPC2 is an interim plan change, the definition of GMP that is proposed and that GMP was previously used in the One Plan, FFNZ's preference is for GMP.</p> <p>FFNZ does not support the reference to Schedule E because it considers that the CNLMs will not achieve the Schedule E targets (and refers to the reasons in its primary submission). FFNZ is also concerned that there is unlikely to be a clear link between the Schedule E targets and GMP and is concerned about the implications of the proposed additional text at the end of Policy 14.3</p>

	Policy 14-5 Management of intensive farming land uses	Oppose in part	FFNZ proposed relief to Policy 14-5 (b) (i) and (ii) and the associated footnotes (deletion), which seeks to provide clarity to existing and new intensive farming land uses.
Water Protection Society (65)	Policy 14-5(b)(i) and (ii) and associated footnotes	<p>WPS seeks amendment to Policy 14-5(b) as follows:</p> <ul style="list-style-type: none"> • delete ‘i.e., established prior to the Plan having legal effect’ • delete ‘i.e., established after the Plan has legal effect’ • Deletion of footnotes and inclusion of new and existing as definitions 	<p>FFNZ does not understand the proposal to include Policy 14-6(e), because paragraph (d) deals with existing intensive farming activities and (e) deals with new (and it therefore follows that it is standalone).</p> <p>As explained in its primary submission, FFNZ seeks significant amendment to paragraph (d) to provide a reasonable controlled activity consent pathway ought to be provided for the farmers who cannot meet the CNLMs in Table 14.2. FFNZ also considers that if there is scope, a similar approach ought to be adopted for new intensive farming activities (and, if that was accepted, there might be a basis for bringing new intensive farming activities within a significantly amended paragraph (d) as proposed in FFNZ’s submission).</p>
Water Protection Society (65)	Policy 14-5(d)	<p>WPS seeks amendments to Policy 14-5(d) as follows:</p> <p>(d) Except as provided for in Policy 14-6(d) and Policy 14-6(e), existing intensive farming land uses regulated in accordance with (b)(i) must be managed to ensure that the leaching of nitrogen from those land uses does not exceed the cumulative nitrogen leaching maximum values for each year contained in Table 14.2.</p>	<p>As PPC2 is an interim plan change, it is not appropriate to consider changing stock exclusion requirements at this time. Council still has to implement the NPS-FM and it is at this time that the broader matters like this should be considered.</p> <p>In addition, FFNZ considers that the proposed setback requirements are onerous, will impose significant costs to farmers and the environmental outcomes are not clear. FFNZ considers that, even if there was scope, there would need to be a robust s32 assessment to support such a proposal (and there is no such assessment). Such a proposal would also affect a significant number of farmers</p>
Water Protection Society (65)	Policy 14-5(f)	<p>WPS seeks amendments to Policy 14-5(f) as follows:</p> <p>(f) Intensive farming land uses regulated in accordance with (b) must exclude cattle from:</p> <ul style="list-style-type: none"> (i) <u>Within 20m from the mean annual highest water level of a wetland or lake that is a rare habitat, threatened habitat or at risk habitat,</u> (ii) <u>Within 5m of the bed of any river that is permanently flowing</u> 	

		(iii) Within 5m of the active bed of any river that is intermittently flowing and that has an active bed width greater than 1 metre (iv) Within 2.5m of the centreline of any watercourse.		and growers (as well as the districts and region) in a significantly adverse way.
Hort NZ (66)	Policy 14-5	The submitter seeks that Policy 14-5 is amended to exclude commercial vegetable growing.	Oppose	<p>As explained above, FFNZ is concerned that an equitable and proportionate approach is taken to nitrogen management from intensive farming activities in PPC2. While it considers that this may not mean an identical management regime for all activities or sectors, it is concerned that the amendments proposed by this result in a substantively different management regime for commercial vegetable growing that will not achieve the water quality objectives and will likely mean that greater reductions from commercial vegetable growing and/or other activities are required in the future.</p> <p>Therefore, FFNZ does not agree to the exclusion of commercial vegetable growing activities from Policy 14-5, unless that was achieved by creating a policy framework that achieved the same proportionate and equitable outcomes, as well as the water quality objectives.</p>
Nga Waihua o Paerangi Trust (63)	Amend footnote	The submitter seeks an amendment to the footnote as follows: The Plan has legal effect in the case of existing intensive farming land uses from the date of notification of the One Plan in 2007.	Oppose	<p>FFNZ has also made a submission on Policy 14-5 that seeks to provide clarity to plan users about the effective dates for intensive farming land uses. FFNZ's understanding of the operative dates differ from those proposed by the submitter, therefore the submission is not supported.</p>
Water Protection Society (65)	Policy 14-6 (c)	<p>WPS requests that Policy 14-6(c) be replaced with</p> <p>(c) Ensure that cattle are excluded from surface water in accordance with Policy 14-5 (f) and (g) except where landscaped or geographical constraints make stock exclusion impractical, and the effects of cattle stock movements are must be avoided, remedied or mitigated. In all such cases, the</p>	Oppose	<p>FFNZ also proposed amendments to 14-6(c) which seek to in summary; retain the status quo, ensure consistency with Policies 14-5 and 14-6 and other regional plans. The amendments sought by WPS do not align with those proposed by FFNZ.</p> <p>FFNZ is also concerned about the significant cost and limitations the proposed changes would place on farmers and there has been no assessment of the risks, costs and</p>

	<p>effects of any unavoidable losses of nitrogen, phosphorus, faecal contamination matter and sediment are must be avoided, remedied or mitigated by other works or environmental compensation.</p>	Oppose	For reasons explained above, FFNZ does not support the inclusion of an arbitrary time period for N reductions from land uses that exceed the CNLMs, and FFNZ does not support a requirement that all farms achieve the CNLMs. FFNZ also supports the inclusion of additional measures to reduce nutrient leaching, and therefore does not support the request by WPS to have this deleted.
Water Protection Society (65)	Policy 14-6 (d) and (i)	Oppose	For the reasons explained above, FFNZ does not support the requirement for all farms to achieve their CNLMs or the adoption of an arbitrary time period for achieving this.
Water Protection Society (65)	Policy 14-6 proposed additional clauses and Policy 14-6(e)	Oppose	<p>FFNZ does not support the proposed amendments to paragraph (i) for reasons including that there is no basis to require farmers to reduce to the CNLMs (e.g. they do not relate to N leaching or water quality) and the requirement to adopt additional innovations and measures will impose significant cost (for uncertain environmental benefit).</p> <p>FFNZ does not support the addition of paragraph (v), which defeats the intention of Policy 14-6(e), part of which is to support a reasonable consenting pathway for activities that cannot reduce to the CNLMs. It is also unduly rigid and does not provide for actions to be appropriately tailored to the particular circumstances.</p> <p>WPS also seeks amendment to Policy 14-6 (e) as follows:</p> <ul style="list-style-type: none"> - Include reference to the 10 year period for exemption. - Replace strategy with goal/s - Include an additional point to the Policy, specifically: <p>(v) The nature, sequencing, measurability and enforceability of any steps proposed to decrease the leaching to below the</p>

		minimums established under Policy 5-8(a).		
Water Protection Society	Policy 14-6 Additional clause (h)	<p>WPS seeks the inclusion of an additional clause to Policy 14-6, specifically:</p> <p>(h) Not permit any intensive farming land use to continue to exceed the nitrogen leaching maximums for more than 10 years.</p>	Oppose	<p>For the reasons explained above, FFNZ strongly opposes the proposal to require reductions to CNLMs or to require this to be achieved in 10 years or for activities that do not do this to effectively be prohibited.</p>
Ngati Turanga (67), Te Roopu Taiao o Ngati Whakatere Trust (68), Te Runanga o Raukawa (70)	Policy 14-6	<p>These submitters oppose the Policy in its entirety, with the following specific changes sought:</p> <ul style="list-style-type: none"> - (b) "manage" should be replaced with "minimise" - (d) (i) delete additional innovations and measures and inclusion of text to <u>not exceed the CNLMs for year 20 in Table 14.2</u> - (d)(ii) inclusion of an end date of 31 December 2025. - (e)(i) proposed innovations and measures represent amended to proposal represents - (e)(i)(B) addition of proportion - (e)(i)(C) additional text as follows further reductions in nutrient leaching <u>and</u> run-off, faecal contamination and sediment losses from the land are currently possible... - (e) (ii) deleted - (e) (iv) deletion of 'over time' and insertion of demonstrated to read as follows <p>The contribution of the progressive reduction in nitrogen leaching and run-off, faecal contamination and sediment loss from the land <u>over time</u> to the <u>demonstrated improvement of ...</u></p> <p>- (vi) new clause as follows</p>	Oppose	<p>FFNZ refers to the reasoning above and in its primary submission, and says further:</p> <ul style="list-style-type: none"> • "Manage" is more appropriate than "minimise", which might require reductions to the smallest extent possible and does not provide for a reasonable risk assessment or consideration of the particular circumstances, costs, etc. • FFNZ does not support the requirement for all farms to meet CNLMs and, as proposed in FFNZ's submission, considers that it is 'additional measures' that ought to be considered (as opposed to innovations, which may indicate that they are experimental or expensive). • FFNZ opposes an end date and, as explained in its submission, considers that it ought to be five years from the date consent is issued to provide as reasonable a transition period as possible. • FFNZ considers that paragraph (e)(i) ought to refer to "mitigation measures" not "innovations." • FFNZ does not support the addition of the word proportion and considers that paragraph (e)(i)(B) ought to refer to the alternative Nitrate leaching rates FFNZ proposes in the amendments it seeks to Policy 14-5(d) in its submission. • FFNZ considers the amendment to paragraph (e)(i)(C) is unnecessary because paragraph (e)(i) refers to the four contaminants. • FFNZ considers that paragraph (e)(ii) should not be deleted but that it should be amended as proposed in its submission.

	<p><u>The presence of wetlands or lakes that are a rare habitat or threatened habitat</u></p> <ul style="list-style-type: none"> - (f)(i) "Measures" replaced with "Good management practices" and "do not increase" replaced with "significantly decrease" - (f)(ii) addition of text "adverse effects caused by" <p>- (f)(iii) amendment of text as follows The nature, sequencing, measurability and enforceability of the programme of de-intensification committed in order to <u>any steps proposed to transition out of the intensive farming land use by the expiry of the resource consent or before 31 December 2025 (whichever comes first)</u>.</p>	<ul style="list-style-type: none"> • FFNZ does not support the proposal to remove "overtime" and add the word "demonstrated" to paragraph (e)(iv) because it considers that there should be time to achieve the reductions and considers that it may not be possible to demonstrate improvements (particularly in the context of cumulative effects) but other options may be available such as modelling or science or other ways of assuming improvements. • FFNZ opposes the amendments to paragraph (f)(i) which have the effect of significantly raising the bar in terms of what is required of farmers and growers (imposing significant cost for no or uncertain environmental benefit). In principle, FFNZ does not have an issue with the addition of "adverse effects caused by" to paragraph (f)(ii) because it considers that this is implicit in the paragraph. But to the extent that this is not the intention, FFNZ opposes the amendment. • FFNZ opposes the amendment to paragraph (f)(iii) for reasons including that it imposes an arbitrary timeframe and the meaning of "de-intensification" is not clear (FFNZ considers that a reasonable consenting pathway ought to be provided and that all activities should not be required to reduce to the CNLMs). 	
Environmental Defence Society (54) and Wellington Fish and Game Council (55)	Policy 14-6	<p>These submitters seek the deletion of paragraphs (d)(i) and (e) and the insertion of "as a minimum" at the end of paragraph (b).</p> <p>If sub-clause (c) is retained, insert the additional words "farm system modelling, optimisation and marginal cost-marginal benefit analysis that determines the range of leaching reductions that are available."</p> <p>Clarify the role of clause (f)(iii) in the hierarchy.</p>	Oppose

		<p>It is not clear where the proposed additional words would be inserted into paragraph (c). However, FFNZ opposes this proposal because undertaking such extensive analysis would impose significant cost on farmers, particularly in the context of an interim plan change like PPC2, for uncertain environmental benefit. In addition, FFNZ considers that it is critical that what is “reasonably practicable” is taken into account (as proposed in its submission) and it appears that these submitters’ proposal would not take into account what is reasonably practicable for individual properties. Accordingly, FFNZ opposes the proposed amendments.</p> <p>In the context of the submissions on paragraph (f)(iii), it is not clear what is meant by “hierarchy” but FFNZ considers there should be no hierarchy in the matters in paragraph (f) and, in the absence of further clarification, FFNZ opposes the proposal.</p>	
Director General of Conservation (61)	Policy 14-6	<p>The submitter seeks that certain paragraphs of Policy 14-6 are amended as follows:</p> <ul style="list-style-type: none"> - (b) Require the implementation of the minimum level of GMP and insert wording as follows: <p>ensure implementation of good management practices to manage <u>minimise</u> nutrient leaching and run off,</p> <ul style="list-style-type: none"> - (d)(i) Identify what percentage or quantum of reduction in the nitrogen exceedance is to be considered appropriate before granting consent and identify over what timeframe these reductions are required and what milestones need to be achieved within that timeframe - (d)(ii) Delete the paragraph or identify the appropriate mechanism by which the policy can guarantee the intensive land use is discontinued, or that a future 	<p>Oppose</p> <ul style="list-style-type: none"> • FFNZ does not support the changes proposed for the reasons stated above and seeks Policy 14-6 to be amended as proposed in FFNZ’s submission. FFNZ says further: <ul style="list-style-type: none"> • “minimise” is not the appropriate metric, particularly where it is used to refer to nutrient leaching as opposed to the risk of leaching. FFNZ is concerned that this could mean reduce to the lowest extent possible and mean that no farming activity (or a substantially different farming activity) is able to be carried out, without consideration of environmental outcomes and costs. This is also not appropriate in an interim plan change like PPC2 and in a plan which is only considering diffuse discharges and only certain types of activities. • FFNZ considers that the reduction required ought to be addressed through a controlled activity consent (as proposed in its submission) and the discretionary activity pathway ought to not specify the reduction required (but provide for reasonable parameters for the consideration of such consents) as proposed in FFNZ’s submission.

	<p>consent would be declined if the transition did not occur.</p> <ul style="list-style-type: none"> - (e) Amend the provisions to provide better direction to plan users and guidance for decision makers when ‘having regard to’ the matters listed in proposed policy (e)(i) through (v) when considering whether or not to grant a resource consent application. Provide direction on how these matters make an intensive land use activity appropriate or not, and how this is linked to a reduction in nutrient leaching, and delete clause (iv) - (f) Delete or amend to clearly dictate the process/steps for the implementation of this policy 	<ul style="list-style-type: none"> • FFNZ considers that a reasonable transition ought to be provided in paragraph (d)(ii), that this will only likely apply to a limited number of activities but that a pathway needs to be provided. Future consent should not be declined because there should be an option to obtain consent if the consent meets the requirements of the rules and policies. • FFNZ considers that paragraph (e) ought to be amended and has proposed amendments in its submission. It does not consider that the policy should be further amended as proposed by this submitter. • FFNZ considers that paragraph (f) ought to be retained to provide an appropriate consenting pathway for existing intensive farming activities and that it should not “dictate the process/steps for implementation.” 	
HortNZ (66)	Policy 14-6	The submitter seeks that Policy 14-6 is amended to exclude commercial vegetable growing	Oppose
BLNZ (74)	Policy 14-6 (b) (i) and (ii), (d)(i) and (ii), (e), (f), and (i)	The submitter seeks the following:	Oppose

	<ul style="list-style-type: none"> - (b) amend definition/reference to GMP and reference to GMP meeting water quality outcomes in Schedule E - (b)(i) – retain - (d)(i) and (ii) – amend GMP reference - (e)(iii) – amend as follows <ul style="list-style-type: none"> (iii) the nature and characteristics of the land, having regard to physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, <u>and topography and Land Use Capability units of the property.</u> - (f) and (i) – delete both clauses and ensure that existing land uses are not grand parented to historical emissions profiles and that emissions are required to reduce over time. 	<p>have been used in other regions. Given that PPC2 is an interim plan change, the definition of GMP that is proposed and GMP was previously used in the One Plan, FFNZ's preference is for GMP.</p> <p>In response to the submitter's comments with regard to Policy 5.8, as discussed in the FFNZ submission, FFNZ does not support the LUC approach and considers that PPC2 is an interim solution while the wider catchment work is done. FFNZ therefore does not support this submitter's proposal to further embed and reinforce the flawed LUC approach by reinstating the reference to LUC in paragraph (b)(i) and (ii) and inserting references to LUC in paragraph (e)(iii).</p> <p>FFNZ considers that paragraph (f) is appropriate in the context of an interim plan change and subject to the wider catchment and NPS-FM implementation work.</p>
Balance (72)	<p>Add new clauses (g) and (h) to Policy 14-6.</p>	<p>Oppose</p> <p>While FFNZ agrees that a viable pathway ought to be provided for farming activities that cannot meet the CNLMs, it does not consider that the proposed additions achieve this. FFNZ is concerned about the potential requirement in paragraph (g)(i) to go above and beyond GMP to innovations (which might be experimental, untested and very expensive) without consideration of the water quality objectives.</p> <p>FFNZ is also concerned that paragraph (h) is still using the CNLMs as the metric when there is no relationship between N leaching or the water quality objectives and LUC or the CNLMs.</p> <p>Therefore, FFNZ opposes the proposed changes and considers its amendments to the policies in PPC2 provide a more reasonable and appropriate policy framework.</p>

	<u>attributable to updates in versions of OVERSEER.</u>		
Ravensdown (45)	Amendments to Policy 14-6 (e)	The submitter seeks the following amendments to Policy 14-6: (e)(i) Whether the proposed innovations and measures represent the best practicable option to minimise... (B) The rate of reduction of nitrogen loss towards the cumulative nitrogen leaching maximum for any given year in Table 14.2 (e) (ii) – delete in full	Oppose in part
Nga Waihau o Paerangi Trust (63)	Policy 14-6 (b), new clause (aa), (c), (d)(i) and (ii),	The submitter seeks the following amendments to Policy 14-6 - (b) Amendments to (b) as proposed to delete 'leaching and' - Contrary to relief above – retain wording of clause (b) of operative Policy - New clause after (a) as follows: <u>(aa) Resource consent applications for farms to exceed the nitrogen leaching maximum must not be granted, unless they meet the criteria in (b) and are managed in accordance with (e).</u> - (c) – retain operative policy wording - (d)(i) – delete clause - (d)(ii) – retain clause - (e) – delete the proposed policy or reword policy so that it is consistent with achieving the water quality objectives of the One Plan and provide clear direction to decision makers to ensure all	Oppose

	practicable measures are taken to minimise loss of contaminants from intensive farming, and that reductions in contaminants are consistent with the water quality strategy set out in the RPS and consistent with the rate and scale of reductions required by Table 14.2 - (f) – delete proposed policy		
Table 14.1 Targeted water management sub-zones			
Water Protection Society (65)	Table 14.1	WPS seeks amendments to the tables and rules to reflect the submission made to the Policies.	Oppose
Ngati Turanga (67), Te Roopu Taiiao o Ngati Whakatere Trust (68), Te Runanga o Raukawa (70)	Table 14.1	These submitters oppose Table 14.1 in its entirety and request that Table 14.1 must be amended based on most recent science. Proposed Table no longer gives effect to Policy 14-5(b)(i) or Policy 5-8.	Oppose in part
Nga Waihua o Paerangi Trust	Table 14.1	Amend Table 14.1 to include the Whangaehu Catchment (and applicable WMSZ).	Oppose
			FFNZ does not support widening the scope of catchments subject to PPC2. FFNZ considers this Plan Change to be an interim change, and considers that the appropriate time to consider other catchments or FMUs is in the context of Horizons Our Freshwater Futures, where the issues specific to each area: values, objectives and appropriate response can be considered, along with views of the whole community. As currently proposed, Our Freshwater Futures will enable targeted catchment plans, focussed on the needs to specific catchments and WMSZ's, while also enabling the catchments community to be fully involved in the process.

Table 14.2 Cumulative nitrogen leaching maximum by land use capability class			
Water Protection Society (65)	Table 14.2	WPS seeks amendments to Table 14.2 to reflect the submission is made on the Policies.	Oppose
Ngati Turanga (67), Te Roopu Taiao o Ngati Whakatere Trust (68), Te Runanga o Raukawa (70)	Table 14.2	The submitters request that Policy 14-5 is amended to include a clause specifying the timing, trigger and method for review of Table 14.2, and that Policy 14-6(e)(ii) is deleted.	<p>Support in part</p> <p>Oppose in part</p> <p>Notwithstanding FFnZ's views that PPC2 and the LUC regime are an interim regime while the broader catchment and NPS-FM implementation work is undertaken, FFnZ considers that Table 14.2 will become out of date as Overseer versions change and that a process for updating the table ought to be provided for. To the extent that this is what these submitters seek, FFnZ supports the proposal but considers that it ought to be addressed in Table 14.2 or a method of the plan (and this support is contingent on the wording and methodology).</p>
Potatoes NZ (75)	New table -Table 14.2A	The submitter proposes that a new table be included to provide different CNLMs for commercial vegetable production	<p>Oppose in part</p> <p>FFnZ considers that Policy 14-6(e)(ii) ought to be retained but amended as proposed in its submission to refer to a methodology to update Table 14.2 as Overseer versions change.</p> <p>FFnZ understands the that the effect of the new Table 14.2A would be that existing commercial vegetable growing activity would need to achieve the year 1 CNLMs (with no further reductions) and new commercial vegetable production activities would have to achieve the year 5 CNLMs (with no further reductions).</p> <p>One concern FFnZ has with the proposal is that the LUC approach in Table 14.2 (on which this is based) is flawed and has no relationship with water quality outcomes. FFnZ is concerned about the implications for water quality if new commercial vegetable growing could establish up to the proposed CNLMs. FFnZ is also concerned about how achievable the CNLMs are for existing commercial vegetable growing activities and how requiring them to meet these numbers will relate to water quality.</p>

		In principle, FFnZ would support an approach where that was more tailored to commercial vegetable growing and achieved the water quality objectives (with each sector or activity doing their bit), but it is concerned that the specific proposal is not the approach way of achieving that. It is also concerned that changes to Table 14.2A (even if they were realistic now) are not going to be enduring with future Overseer version change and do not address issues that arise for activities that cannot be appropriately modelled in Overseer.
Balance (72)	Reference to Table 14.2	The submitter seeks the inclusion of the following text to accompany Table 14.2: Table 14.2 Cumulative nitrogen leaching maximum by Land Use Capability as calculated by Overseer version 6.3.1
Nga Waihua o Paerangi Trust (63)	Table 14.2 – operative and proposed	<p>The submitter requests:</p> <ul style="list-style-type: none"> - The current Table 14.2 is retained and applied to catchments not in the Tararua District (catchments on the western side of the Ruahine and Tararua ranges) - Retain the amendments to Table 14.2 as proposed as a separate table for Tararua catchments only.
Water Protection Society (65)	Amendment to tables and rules to reflect submission on Policies	<p>WPS seeks amendments to the tables and rules to reflect the submission made to the Policies.</p>
Ngati Turanga (67), Te Roopu Taiao o Ngati	Various amendments	<p>The submitters seek amendments to the rule text as follows:</p>

<p>Whakatere Trust (68), Te Runanga o Raukawa (70)</p>	<ul style="list-style-type: none"> - Retain original wording of matter of control (b) to require demonstration of compliance with CNLMs in Table 14.2. - Addition of text as paragraph (ba) or (j) as follows: <p><u>Good management practices to avoid, remedy or mitigate nutrient leaching and run off, faecal contamination and sediment losses from the land.</u></p> <p>Delete the reference to Policy 14-6</p>	<ul style="list-style-type: none"> • Requiring adherence to the CNLMs in matter of control (b) will not provide an appropriate or a viable consenting pathway, nor is it a relevant matter of control if the rule requires the CNLMs to be met or if the rule provides for farms who make a 10% reduction in N or reduce to the 75th percentile (as proposed in FFNZ's submission). • If paragraph (b) is retained, there is no need for the proposed paragraph (ba) or (j) • FFNZ considers that it is important that policy 14-6 is considered and therefore opposes the proposed deletion of that policy.
<p>Environmental Defence Society (54) and Wellington Fish and Game Council (55)</p>	<p>Matters of control (b) and (i)</p> <ul style="list-style-type: none"> - The submitters seek the following amendments to Rule 14.1: <ul style="list-style-type: none"> - Revert paragraph (b) in Matters of Control to pre PPC2 wording - Amend (i) to read “the matters in Objectives and Policies, particularly those in Chapter 5 and 14..” 	<p>Oppose</p> <p>FFNZ seeks amendments to Rule 14.1 to provide a reasonable controlled activity pathway and considers that the proposed amendments will not achieve that. It says further:</p> <ul style="list-style-type: none"> • Requiring adherence to the CNLMs in matter of control (b) will not provide an appropriate or a viable consenting pathway, nor is it a relevant matter of control if the rule requires the CNLMs to be met or if the rule provides for farms who make a 10% reduction in N or reduce to the 75th percentile (as proposed in FFNZ's submission). • Paragraph (i) ought to refer to the specific policies that relate to the controlled activity and not a general reference to chapters 5 and 14 as proposed by these submitters.
<p>HortNZ (66)</p>	<p>Rule 14-1</p> <p>New rules proposed - 14-2BX, 14-2CX, 14-2DX, 14-2EX</p>	<p>Oppose</p> <p>FFNZ anticipates that part of the motivation for the proposed rule framework is to focus on land area as opposed to nitrogen leaching because Overseer has issues modelling some horticulture activities. While FFNZ considers that alternative approaches to recognise this may have merit, it does not consider that this submitter's proposal is appropriate or achieves an equitable and proportionate approach to nitrogen management from intensive farming activities in PPC2.</p> <p>FFNZ's concerns include that nitrogen increases from these activities since the One Plan become operative (and at a time</p> <ul style="list-style-type: none"> • The submitter seeks that Rule 14-1 be amended to exclude commercial vegetable growing. It also seeks new permitted, controlled, restricted discretionary and discretionary activity rules for commercial vegetable growing activities. In summary, the proposed regime is: <ul style="list-style-type: none"> • Permitted if it meets GMP and is not in the water management sub-zones in Table 14.1.

	<ul style="list-style-type: none"> For activities in the water management sub-zones in Table 14.1, controlled if it meets the CNLMs in Table 14.2 or if it achieves BMP and is the same area and intensity as at 22 July 2019. Restricted discretionary for new commercial vegetable growing activities where the increase in land area if no more than 10% of the commercial vegetable growing area at 22 July 2019. Discretionary for activities that do not meet the above rules. 	<p>when growers were or ought to have been aware of the relevant rules) could be significant (but there is no assessment of the implications for water quality and implications for future reductions as a result). FFnZ is also concerned that a 10% increase in land area on a consent by consent basis could result in significant increase in nitrogen and this would again have implications for the water quality objectives and future reductions.</p> <p>FFnZ considers that its proposed rule regime (particularly if the 75th percentile is calculated on the nitrogen curve for commercial vegetable growing, for example) better achieves an equitable and proportionate management regime, at least in the context of the interim nature of PPC2 and the work being undertaken by Council to better understand land uses and water quality issues in the catchment.</p>	<p>Oppose in part</p> <p>As explained above, FFnZ is concerned that an equitable and proportionate approach is taken to nitrogen management from intensive farming activities in PPC2, noting that may not mean an identical management regime for all activities or sectors.</p> <p>In respect of the proposed controlled activity rule, the submitter proposes that the 2017/18 year is taken as the baseline (whereas FFnZ proposes 2012/13) and that reductions starting at 15% and culminating in 36% in year 20 are made (FFnZ proposes 10% or the 75th percentile). Due to the difference in baseline and lack of information regarding the 75th percentile for commercial vegetable growing, FFnZ cannot assess whether this submitter's proposal is more stringent or the water quality outcomes. FFnZ would support it if it did achieve an effects based, proportionate and equitable regime when compared with the requirements for other intensive farming activities.</p>
Woodhaven Gardens (57)	<p>Additional Rules for Commercial Vegetable Growing</p>	<p>The submitter seeks the addition of rules to provide:</p> <ul style="list-style-type: none"> - A controlled activity pathway for existing commercial growing inside a WMSZ with a table specifying required nitrogen loss reductions for growers if they are unable to meet Table 14.2. The starting position should be based on the enterprise baseline of total average nitrogen loss inside the WMSZ 2017-2018. - A restricted discretionary activity pathway for existing commercial vegetable growing inside WMSZ that cannot meet Table 14.2 and cannot meet the controlled activity pathway (according to the proposed new policy) to continue growing at independently audited Best Management Practice. 	<p>The submitter also seeks that the proposed rules are linked to land areas that existed as</p> <p>FFnZ takes the same position with the proposed restricted discretionary rule and says further that if a restricted</p>

	<p>at 2017-2018 as this date aligns with growers learning from Horizons that Council would not proceed with GMP. Prior to this date growers made investments in CVP activities.</p> <p>The submitter also seeks the addition of caps or small reductions required for Land Users below values on Table 14.2</p>	<p>discretionary rule is proposed for commercial vegetable growing, the discretionary activity rule for pastoral farming should also be restricted discretionary to achieve an equitable and proportionate and effects based outcome.</p> <p>It is not clear what the implication of a caps or small reduction approach for those below Table 14.2 would mean in terms of water quality and cost. Therefore FFNZ opposes this proposal.</p>	<p>Oppose in part</p> <p>FFNZ understands that the intention of these rules is to provide for some tailoring of a nitrogen management regime to the specific characteristics of commercial vegetable growing e.g. crop rotation and issues with Overseer estimating or modelling nitrogen for some activities.</p> <p>In principle, FFNZ supports an approach that is tailored and achieves the same proportionate outcome and effects based approach as what FFNZ proposes in its primary submission, with each sector or activity doing their bit. To the extent that this is what the submission achieves, FFNZ would support the approach.</p> <ul style="list-style-type: none"> - Permitted if the land area is less than 4.1ha - Controlled if it meets the CNLMs in the new Table 14.2A - Restricted discretionary for new commercial vegetable activities that meet Table 14.2A - Discretionary if Table 14.2A is met but the commercial vegetable production land area is exceeded. - Non complying for all other activities 	<p>However, to the extent that this is not what is intended, and the effect is that other sectors or activities will have to make greater reductions in the future as a consequence or water quality outcomes will not be achieved or one sector will make an windfall gain at the expense of another, FFNZ does not support the submission.</p> <p>FFNZ is also concerned about amendments to Table 14.2A and refers to the reasons set out above in response to the specific submission point by this submitter on Table 14.2A. The water quality implications, as well as implications for future reductions are not clear. For all of these reasons, FFNZ opposes the proposed new rules.</p>
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BLNZ (74)	Reference to GMP	As with the wider submission, the submitter seeks to change the references in Rule 14-2 from GMP to good farming practice principles	Oppose in part	In principle (and based on FFNZ's understanding of the GFP principles), FFNZ considers there is no meaningful difference between "GMP" and "GFP". It notes that both approaches have been used in other regions. Given that PPC2 is an interim plan change, the definition of GMP that is proposed and that GMP was previously used in the One Plan, FFNZ's preference is for GMP.
Balance (72)	Rule 14-1 (a)	The submitter seeks the following amendments to paragraph (a) A nutrient management plan must be prepared for the land <u>every three years, or following any significant farm system change,</u> and provided annually to the Regional Council. NMPs must be reviewed annually to confirm ongoing appropriateness and where changes to the NMP are implemented, the Regional Council must be notified.	Support in part Oppose in part	FFNZ agrees that the requirement to submit a NMP to the council annually is too onerous. FFNZ is concerned that a requirement to do it every three years is also too onerous and it ought to only occur when there is a significant farm system change. FFNZ is concerned about the requirement that NMPs be reviewed annually and the cost to the farmer if it is to be done by a consultant. FFNZ considers that the requirement should simply be that if there is a change in actions or timing a new NMP must be submitted.
Nga Waihau o Paerangi Trust (63)	Rule 14-1 - Control	The submitter seeks the following relief: - Retain matter of control (b) as in operative One Plan - Insert new matter of control to address additional GMP as set out in PC2 - Matters of control (14-5 and 14-6) – oppose to the extent that the content of policies 14-5 and 14-6 are not supported.	Oppose	FFNZ seeks amendments to Rule 14.1 to provide a reasonable controlled activity pathway and considers that the proposed amendments will not achieve that.
Water Protection Society (65)	Amendment to tables and rules to reflect submission on Policies	WPS seeks amendments to the tables and rules to reflect the submission made to the Policies.	Oppose	FFNZ also does not support amending the rules to align with the changes sought by WPS for the Policies and Methods for PPC2.
Ngati Turanga (67), Te Roopu Taiao o Ngati	Rule 14.2	The submitters seek amendments to the rule text as follows:	Oppose	FFNZ considers that the RDA pathway ought to provide for activities that cannot meet the NMP standards in Rule 14-1. As explained in its submission, it considers that it is

Whakatere Trust (68), Te Runanga o Raukawa (70)	- Delete the reference to paragraphs (a) and (b) of Rule 14-1		Oppose	appropriate for these activities to be considered as a RDA (as opposed to defaulting to discretionary). Therefore it opposes the proposed amendments.
Environmental Defence Society (54) and Wellington Fish and Game Council (55)	Rule 14.2 The submitters seek that rule 14.2 is amended to read: “Existing intensive farming land use activities not complying with any of the conditions, standards and terms (a), (b) and (d) and (i) of Rule 14.1. They also seek changes to paragraph (b) to read “measures, including good management practices” and to paragraph (i) to read “the matters in Objectives and Policies, particularly those in Chapter 5 and 14..		Oppose	The amendment to the rule text is not clear and FFNZ considers that it does not require amendment and refers to its primary submission. FFNZ does not support the amendment to paragraph (b) of the matters of discretion because the discretion ought to be directed to GMPs to avoid remedy or mitigate nutrient leaching and run off as opposed to a more generic reference to measures including GMP. As explained above, FFNZ does not support the amendment to paragraph (i) and considers the specific policies that are relevant ought to be (and have been) referred to.
HortNZ (66)	Rule 14-2 The submitter seeks that Rule 14-2 is amended to exclude commercial vegetable growing.		Oppose	As explained above, FFNZ has concerns about the alternative rule regime proposed by this submitter, including that it will not achieve an effects based, proportionate and equitable nitrogen management regime across all activities and sectors. Therefore, FFNZ opposes excluding commercial vegetable production from Rule 14-2 and considers that its proposed amendments to this rule are more appropriate.
BLNZ (74)	Reference to GMP	As with the wider submission, the submitter seeks to change GMP to good farming practice principles	Oppose in part	In principle (and based on FFNZ's understanding of the GFP principles), FFNZ considers there is no meaningful difference between “GMP” and “GFP”. It notes that both approaches have been used in other regions. Given that PPC2 is an interim plan change, the definition of GMP that is proposed and that GMP was previously used in the One Plan, FFNZ's preference is for GMP.
Balance (72)	Rule 14-2 (a)	The submitter seeks the following amendments to (a) A nutrient management plan must be prepared for the land every three years, or	Support in part	FFNZ agrees that the requirement to submit a NMP to the council annually is too onerous. FFNZ is concerned that a requirement to do it every three years is also too onerous and

	<p><u>following any significant farm system change, and provided annually to the Regional Council. NMPs must be reviewed annually to confirm ongoing appropriateness and where changes to the NMP are implemented, the Regional Council must be notified.</u></p>	Oppose in part	<p>it ought to only occur when there is a significant farm system change.</p> <p>FFNZ is concerned about the requirement that NMPs be reviewed annually and the cost to the farmer if it is to be done by a consultant. FFNZ considers that the requirement should simply be that if there is a change in actions or timing a new NMP must be submitted.</p>
Rule 14-2A Existing intensive farming activities not complying with condition, standard, term (c) of Rule 14-1 or Rule 14-2	Rule 14.2 (A) Ngati Turanga (67), Te Roopu Taiao o Ngati Whakatere Trust (68), Te Runanga o Raukawa (70) and Nga Wainua o Paerangi Trust (63), Kahungunu ki Tamaki nui-a-Rua (4)	Oppose	<p>The submitters seek to change the activity status for this rule from discretionary to non-complying</p> <p>FFNZ seeks a viable and appropriate consenting pathway for farmers and growers who cannot meet Table 14.2 or who cannot make the reductions proposed by FFNZ in its amendments to the controlled activity rule (i.e. 10% or 75th percentile). FFNZ considers that a discretionary activity rule with an appropriate policy framework will achieve that.</p> <p>FFNZ considers that a non-complying activity status will impose significant cost on farmers, unnecessarily raises the bar for such consents and is not appropriate when it is clearly contemplated that there will be activities that will require consents under this rule (the section 32 report estimates all unconsented horticulture and around 50% of dairy, under FFNZ's proposed changes it is likely this would be less but there would still be a need for a reasonable consenting pathway).</p> <p>Accordingly, FFNZ opposes the proposed change to activity status.</p>
Environmental Defence Society (54) and Wellington Fish and Game Council (55)	Rule 14.2 (A)	Oppose	<p>The submitters seek amendments to rule 14.2 (A) with the effect that:</p> <ul style="list-style-type: none"> - land use activities not complying with condition, standard, term (c) of rule 14 would be non-complying. <p>For the reasons explained above, FFNZ does not support a non-complying activity status and seeks a viable, reasonable and appropriate consenting pathway for intensive farming activities that cannot meet the controlled activity rule.</p>

HortNZ (66)	Rule 14-2 (A)	The submitter seeks that Rule 14-2 (A) is amended to exclude commercial vegetable growing.	Oppose	As explained above, FFNZ has concerns about the alternative rule regime proposed by this submitter, including that it will not achieve an effects based, proportionate and equitable nitrogen management regime across all activities and sectors. Therefore, FFNZ opposes excluding commercial vegetable production from Rule 14-2 and considers that its proposed amendments to this rule are more appropriate.
Water Protection Society (65)	Glossary – Good management practices	WPS seeks an amendment to the definition of good management practices, specifically: When making decisions on resource consent applications, and setting consent conditions, for activities affecting groundwater and surface water quality, the Regional Council must have regard to good management practices and additional measures for decreasing nitrogen leaching and the extent to which those good management practices and additional measures help give effect to Policies 5-1 to 5-8 address the matters in-and Policies 14-1, 14-2, 14-4, and 14-5 and 14-6.	Oppose	While FFNZ supports the adoption of a GMP framework, it needs to be recognised that GMP can be site specific or farm specific (as well as region, sector or farm system specific). It is important that additional measures are adopted as minimum standards that must be adopted by all farms. What is important is that the principles or outcomes sought are GMP, and the specific practices or actions are tailored to the specific situation.
Ngati Turanga (67), Te Roopu Taiao o Ngati Whakatere Trust (68), Te Runanga o Raukawa (70) and Nga Vaihua o Paerangi Trust	Additional schedule provided	The submitters seek that along with the definition provided, a new Schedule (Schedule K) should be included in the Regional Plan to list on farm practical measures and methods.	Oppose	Consistent with comments made earlier with regard to GMP, FFNZ does not support an approach to GMP that is rigidly defined and static in time. It is not appropriate to list the actions in a plan (which would require a Schedule 1 process to amend) and not possible to list every potential action, practice or mitigation that may be relevant. GMPs need to be tailored to the particular farm and provide for ongoing innovation and refinement. Accordingly, FFNZ opposes the submitters' proposal.
Director General of Conservation ((61))	Amendment of definition and inclusion of	The submitter seeks the definition to be amended to identify what constitutes GMP, and include minimum requirement for what GMP are required within nutrient	Oppose	Consistent with comments made earlier with regard to GMP, FFNZ does not support an approach to GMP that is rigidly defined and static in time. It is not possible (nor appropriate) to precisely define GMP or the anticipated water quality.

	minimum requirements	management plans or a farm environment plan and what the anticipated environmental outcomes are.		outcomes. FFNZ considers that a tailored approach that provides for innovation and refinement is appropriate. Therefore, it opposes the submitter's proposal.
Potatoes NZ (75)	Text inclusion	The submitter seeks that the definition of GMP amended as follows: ... at a sector of community level to <u>measure, manage and minimise</u>	Oppose in part	FFNZ considers that the word "minimise" ought to be deleted but agreed that the word "manage" should be added (and refers to the reasons in its primary submission).
				It is not clear what is meant by "measure" and whether the intention is to rely on alternative decision support tools to estimate contaminant discharges. While FFNZ considers that there may be merit in such a proposal (and that PPC2 ought to provide for alternatives to Overseer and for recognition of mitigations outside Overseer, where appropriate), this ought to be through Council approval and transparent, as opposed to relying on a definition of GMP. Therefore, FFNZ does not support this submission.
BLNZ (74)	Change definition from GMP to good farming practice principles	As with the wider submission, the submitter seeks to change GMP to good farming practice principles	Oppose in part	In principle (and based on FFNZ's understanding of the GFP principles), FFNZ considers there is no meaningful difference between "GMP" and "GFP". It notes that both approaches have been used in other regions. Given that PPC2 is an interim plan change, the definition of GMP that is proposed and that GMP was previously used in the One Plan, FFNZ's preference is for GMP.
Balance (72)	Amend definition according to the	The submitter seeks that the definition be amended to refer primarily to the Industry	Oppose in part	In principle, FFNZ would support building on work in other regions and providing greater clarity about GMP. However, it

	Matrix of Good Management 2015	Agreed Good Management Practices to Water quality (Matrix of Good Management, 2015.	is concerned that the MGM 2015 is almost five years old and was developed in the context of the Canterbury region. Consideration would need to be given to changes in practices since then and to the particular characteristics of the Horizons region and the areas subject to PPC2.
Ravensdown (45)	Amend definition of GMP	The submitter seeks to amend the definition by replacing standards with guidance documents.	Oppose in part In principle, FFNZ considers that further guidance can be obtained by reference to industry developed and accepted guidance documents. However, it is important that these are not locked in time and that they are widely accepted. FFNZ considers that this could more appropriately be addressed through an implementation plan as opposed to the plan change itself.
Glossary – Nutrient management plan		The submitters request that the definition of NMP and all references to NMP within the Plan are replaced with Farm Environment Plan (FEP). o Ngati Turanga (67), Te Roroa Taiao o Ngati Whakatere Trust (68), Te Runanga o Raukawa (70)	Oppose in part It is not clear whether the proposal is simply to change the name of the document or whether it is a substantive change to the content and purpose of the document. FFNZ considers that the name of the plan is not relevant, but it is the content that is important. Other regions have adopted a variety of approaches. Given that PPC2 is an interim plan change and that many farmers have already obtained a NMP, and that no changes are proposed to the substantive content of the NMP, the terminology of "NMP" ought to be retained.
Environmental Defence Society (54) and Wellington Fish and Game Council (55)	Definition	The submitters seek amendments to the definition of "NMP" to: - Reinstate the reference to OVERSEER - Update the definition in line with the most recent Code of Practice of Nutrient Management (2017)	Oppose in part FFNZ considers that the NMP ought to reasonably provide for the use of alternative models to Overseer. The deletion of the word "Overseer" in the definition of NMP has the effect of providing for Overseer and other models. FFNZ therefore does not support reinstating "Overseer" and limiting the models to this one model. FFNZ agrees that the most recent code of practice ought to be adopted and that it could be the 2017 one as proposed and provide for amendment as that is updated by the inclusion of words like "or as updated" or "or the most recent version."

Potatoes NZ (75)	Delete last sentence of definition	The submitter seeks the deletion of the last sentence of the definition of "NMP" as follows and-a-Certificate-of-Completion-in-Advanced Sustainable Nutrient Management from Massey University	Oppose in part	It is not clear whether the submitter has proposed this change to address concerns about the need to prepare a NMP annually, or a nutrient budget annually, or the need to prepare the NMP itself. FFNZ considers that the NMP ought to be able to be prepared by the farmer but needs to be signed off or certified by a suitably qualified expert and therefore considers that some form of certification is required. This may not necessarily be the Advanced Sustainable Nutrient Management Certificate and it may be that the Chief Executive of the Council could approve.
Balance (72)	Amend definition of Nutrient Management Plan to be consistent with prior relief	The submitter seeks the following amendments to the definition - Delete annually - Update 2007 to 2013 - Addition of following text to end of definition Is reviewed annually and updated following any significant change to farming system.	Support in part Oppose in part	FFNZ agrees that the NMP should not be required to be submitted annually. However, it is concerned that a requirement to review it annually would likely be onerous if this requires a farmer to engage a consultant. FFNZ considers that it would be more appropriate to review it if there is a significant change in farm system.
Ravensdown (45)	Amend definition of Nutrient Management Plan	The submitter seeks to amend the definition as follows: ... <u>(including copies of the OVERSEER input and output files of information used in and derived from the recognised nutrient management model used to prepare the plan)....</u>	Support	FFNZ considers that the proposed amendments would provide for the consideration of alternative nutrient management models to Overseer and supports such an approach.

	Glossary – other definitions	Definitions for Existing intensive farming land use, New intensive farming land use	WPS seeks the inclusion of definitions for existing intensive farming land use and new intensive farming land use be defined.	Oppose	FFNZ proposes relief to Policy 14-5 which provides clarity to whether intensive farming land uses are new or existing.
Hort NZ(66)	Amend the definition of commercial vegetable farming, new definitions for enterprise, farm and horticultural farming	The submitter seeks the following: - Amend the definition of Commercial Vegetable Growing as follows: Commercial vegetable growing means using an area of land greater than 4 ha for producing <u>commercial production of</u> vegetable crops for human consumption, <u>on</u> a horticultural farm. It includes the whole rotational cycle, being the period of time that is required for the full sequence of crops, including any pasture phase in the rotation. Fruit crops, vegetables that are perennial, dry field peas or beans and other low intensity horticultural crops are not included.	Oppose in Part	<p>Insufficient information is available for FFNZ to assess the implications of amending the definition of “commercial vegetable growing.” If the intention is to exclude vegetables grown at a small scale for personal use, FFNZ considers that that would be achieved by the 4ha limitation in this definition and it is not clear whether growing on land greater than 4ha is used for anything other than commercial production. Due to this, FFNZ opposes the changes sought.</p> <p>In principle, FFNZ agrees that defining the new terms proposed by this submitter may be helpful. However, the new definitions arise as a result of the changes this submitter wants to the policy and rule framework, which FFNZ does not agree is the most appropriate framework.</p> <ul style="list-style-type: none"> - Adopt new definitions as follows: <p><u>Enterprise</u> means one or more parcels of land held in single or multiple ownership to support the principle land use, or land on which the principle land use is reliant, which constitutes a single operating unit for the purposes of management.</p> <p>Farm means a property, area of land, or enterprise used for pastoral farming, horticultural farming, arable farming, other than a farm engaged in intensive indoor primary production.</p>	

	Horticultural farming means farming where the predominant activity is growing food or beverage crops for human consumption (other than arable crops), or flowers for commercial supply.		
Potatoes NZ (75)	New definitions – baseline commercial vegetable growing area and crop rotation	<p>The submitter seeks the inclusion of new definitions for “baseline commercial vegetable growing area” and “crop rotation” as follows.</p> <p><u>Baseline commercial vegetable growing area</u> – means the area of land utilised for commercial vegetable production at the dates in Table 14.1 and the land is under the control (owned or leased) of a single grower or enterprise; and the area of land which is categorised as LUC Class 1 and/or Class II in each water management sub zone.</p> <p>Crop rotation is the systematic planting of different crops in a particular order over several years in the same growing space. This process helps maintain nutrients in the soil, reduce soil erosion, and prevents plant diseases and pests.</p>	<p>Oppose in part</p> <p>In principle, FFNZ agrees that defining the new terms proposed by this submitter may be helpful. However, the new definitions arise as a result of the changes this submitter wants to the policy and rule framework, which FFNZ does not agree is the most appropriate framework.</p>
Other submission points	Griffins Foods Ltd (1), Also submitters 6 to 39, 41, 43, 44, and 60.	<ul style="list-style-type: none"> Provisions added to incentivise and enable vegetable growers to move to suitable land in different catchments across the region, to account for crop rotations, leased land arrangements and to enable growers to move to less environmentally sensitive locations as they are available. 	<p>Support in part, oppose in part</p> <p>FFNZ is a pan sector organisation and supports a regime that is effects based as well as provides appropriate transition periods and incentives for land use change or transitions to lower N leaching activities. To the extent that the submitter seeks that outcome, FFNZ supports the submission. However, to the extent that the outcome sought would give priority to one land use over another (particularly in the absence of national direction or an effects based assessment), FFNZ does not support the submission.</p>

	<ul style="list-style-type: none"> The ability for growers to manage environmental issues collectively to improve water quality issues 	Many submitters make a similar or identical submission as this submitter. Rather than respond to each individual submission, FFNZ has responded to this submission and makes the same submission in respect of those who have also raised the submission point.	
Horowhenua District Council ("HDC") (42)	Entire Plan Change	HDC submits that PPC2 be withdrawn to allow for the completion of the scheduled catchment reviews and transitioned to a Collaborative Planning Process.	Support in part
		FFNZ supports the statements raised by HDC that "A robust catchment review process is the best option for informing good policy and regulation leading to sustainable practices and improved water quality outcomes long term." FFNZ considers that its submission proposes a middle ground whereby an interim solution for unconsented activities is provided for until the wider catchment work is undertaken.	
Horowhenua District Council (42) and Combined Councils (82), Palmerston North City Council ((83) and Manawatu District Council (87) and Ruapehu District Council (2)	Clarification of coverage of PPC2 to municipal wastewater	The Territorial Authorities submit that PPC2 needs to be amended to, as a minimum, exclude areas which receive municipal wastewater by application to land from needing to meet Table 14-2 Nitrogen leaching limits and that municipal wastewater applications be provided for by an alternative policy -framework similar to Policy 5-6.	Oppose
Forest and Bird	PPC2 – entire proposal	The submitters do not support PPC2 in its entirety and seek that the whole plan change is withdrawn.	Oppose

Muaupoko Tribal Authority (62), Kahungunu ki Tamaki nui a Rua Trust (4)			
Jill Sheehy (81)	PPC2 – entire proposal	This submitter asks that the submission process is extended to enable Horizons to engage with iwi as appropriate.	Oppose FFNZ does not support an extension to the submission period, as this has the potential to create greater uncertainty for farmers. FFNZ also reiterates that PPC2 is intended to be an interim Plan Change and therefore the submitter's concerns could be addressed through the NPS-FM FMU/catchment community led process.
Director General of Conservation (61)	Give effect to NPS-FM	The submitter also asks that PPC2 give effect to the NPS-FM.	Oppose FFNZ considers that PPC2 is an interim plan change, noting that a regional catchment specific review/regime is necessary to give effect to the NPS-FM. FFNZ considers that PPC2 does not give effect to the NPS-FM but the work needed to do that has not yet been completed and it is not possible at this time.
Potatoes NZ (75)	Changes to Schedule B and new Appendix	The submitter also seeks changes to Schedule B – Surface Water Management Values and proposes a new Appendix (Schedule X – Rotation (Commercial Vegetable Production) Management Plan)	Oppose in part FFNZ is concerned about the potential implications of amendments to the surface water management values and that this is beyond the scope of PPC2. FFNZ considers that the values ought to be considered as part of a community led catchment process to implement the NPS-FM as opposed to amended in an ad hoc way as a means to address concerns with PPC2 (which FFNZ views as an interim plan change until the NPS-FM is implemented).
Muaupoko Tribal Authority (62)	Lake Horowhenua	The submitter requests that Lake Horowhenua catchment be removed from PPC2.	Oppose FFNZ considers that PPC2 is an interim plan change, noting that a regional catchment specific review/regime is necessary to give effect to the NPS-FM. The implications of removing

			this catchment have not been considered and FFNZ considers that this can only be considered in the context of this broader catchment work.
Te Mauri o Rangitane o Manawatu (85)	Cultural Assessment	The submitter requests that Horizons undertake a cultural assessment to inform PPC2 immediately	Support in part FFNZ considers that all of the effects of PPC2 ought to be considered and to the extent that the cultural impact assessment is inadequate, FFNZ agrees that it ought to be undertaken. FFNZ also considers a robust social impact assessment as well as an assessment of the economic costs ought to be undertaken.
Kahungunu ki Tamaki nui a Rua Trust (4)	Additional requests	In addition to not supporting PPC2, the submitter also requests: - Where BPOs and GMPs are promoted, need to take into account nutrient losses from fair drainage systems (tile, NovaFlow, farms) and managing these as point source discharges. - Greater consideration of the cumulative effects of multiple land use activities within sub catchments and water management zones with the ultimate aim of reducing nutrients in catchments where water quality is degraded and managing nutrients within catchment load limits.	Oppose FFNZ does not support broadening the scope of PPC2 to point source discharges from drainage systems. It considers that this would be more appropriately considered as part of the wider catchment work. FFNZ considers that catchment load limits have not been set and therefore it is not possible to assess cumulative effects and nutrient reductions. It considers that this is something that would be more appropriately considered as part of the wider catchment work.