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FURTHER SUBMISSION

3 DECEMBER 2019

TO:

HORIZONS REGIONAL COUNCIL

FURTHER SUBMISSION ON:

**Proposed Plan Change 2 (PPC2) to the
Manawatu-Whanganui Regional Council
(Horizons) One Plan**

BY:

Beef + Lamb New Zealand Ltd

FURTHER SUBMISSION TO HORIZONS REGIONAL COUNCIL ON THE PROPOSED PLAN CHANGE 2 (PPC2) TO THE MANAWATU- WHANGANUI REGIONAL COUNCIL (HORIZONS) ONE PLAN

Submission on publicly notified proposal for policy statement or plan

Clause 6 of First Schedule, Resource Management Act 1991

To: Horizons Regional Council
Private Bay 11025
Manawatu Mail Centre
Palmerston North 4442

Email: submissions@horizons.govt.nz

Name of submitter: Beef + Lamb New Zealand Limited

Contact person: Dave Harrison
General Manager Policy and Advocacy

Address for service: Dylan.muggeridge@beeflambnz.com
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Havelock North 4130

Beef + Lamb New Zealand Limited could not gain an advantage in trade competition through this further submission.

Beef + Lamb New Zealand (B+LNZ) is making this Further Submission because, as the industry good organisation representing New Zealand's sheep and beef farmers, it has an interest in this Plan Change process which is greater than the general public interest.

The specific provisions of the proposal that Beef + Lamb NZ Ltd further submission relates to and the decisions it seeks from Council are as detailed on the following pages. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

Beef + Lamb New Zealand wishes to be heard in support of its Further Submission and, is willing to consider presenting a joint case at hearing with other submitters addressing similar issues.

I can confirm that I am authorised to make this Further Submission on Beef + Lamb New Zealand's behalf and, that copies will be served on the persons who made the original submissions to which it relates within 5 working days of today's date.



Dave Harrison
General Manager Policy and Advocacy
Beef + Lamb New Zealand Ltd

3 December 2019

1. Beef + Lamb New Zealand Further Submissions on PC2

- 1.1 For the avoidance of doubt, B+LNZ does not resile from the decisions sought in its original submissions made on PC2. These further submissions are in addition to the original submission points made on PC2.
- 1.2 The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the Plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

Submitter Name & number	The specific provisions B+LNZ submission relates to are:	B+LNZ submission is that:		The decision B+LNZ would like the Horizons Regional Council to make is:
		SUPPORT / OPPOSE	REASON	
DairyNZ Submitter No 40	Policy 5-8 Statement #1 Topic 5	Support in part	Submission is generally consistent with the key points and intent made by B+LNZ in its own submissions.	Submission should be allowed
	Policy 14-5 Statement #5 Topic 14	Oppose in part	Submission proposes to restrict existing intensive farming which is unable to meet Table 14.2 to (ii) 90% of the leaching occurring on the land in the 2012/2013 year; and iii) The 75th percentile nitrogen leaching loss* for the Surface Water Management Zone* Submission is inconsistent with the B+LNZ submission and relief sought, in that the maximum N leaching is not related to the natural capital of the land (LUC), but rather the distribution of existing leaching from the catchment. B+LNZ support provisions which provide for existing farming activities to be provided with a pathway to apply for consent where they exceed the Table 14.2 N leaching standards.	Submission should be disallowed

			However, maximum N leaching standards applied through consent should relate to the natural capital of the land, including The nature and characteristics of the land, having regard to physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, and topography of the property.		
	Policy 14-6 Statement #6 Topic 14	Support part	in	Submission is generally consistent with the key points and intent made by B+LNZ in its own submissions.	Submission should be allowed
	Rule 14-1 Statement #8 Topic 14 and Rule 14-2 Statement 9 Topic 14 and New definition Statement 14 Topic GL	Oppose part	in	Submission proposes to restrict existing intensive farming which is unable to meet Table 14.2 to (ii) 90% of the leaching occurring on the land in the 2012/2013 year ; and iii)The 75th percentile nitrogen leaching loss* for the Surface Water Management Zone* . To put in place a new Nitrogen leaching limit. Submission is inconsistent with the B+LNZ submission and relief sought, in that the maximum N leaching is not related to the natural capital of the land (LUC), but rather the distribution of existing leaching from the catchment. B+LNZ support provisions which provide for existing farming activities to be provided with a pathway to apply for consent where they exceed the Table 14.2 N leaching standards. However, maximum N leaching standards applied through consent should relate to the natural capital of the land, including The nature and characteristics of the land, having regard to physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, and topography of the property.	Submission should be disallowed
Federated Farmers of New Zealand Inc	Policy 5-8 Statement # 1 Topic 5	Oppose part	in	Submission proposes to restrict existing intensive farming which is unable to meet Table 14.2 to (ii) 90% of the leaching occurring on the land in the 2012/2013 year ; and iii)The 75th percentile	Submission should be disallowed

Submitter No 58			nitrogen leaching loss* for the Surface Water Management Zone*. To put in place a new Nitrogen leaching limit. Submission is inconsistent with the B+LNZ submission and relief sought, in that the maximum N leaching is not related to the natural capital of the land (LUC), but rather the distribution of existing leaching from the catchment. B+LNZ support provisions which provide for existing farming activities to be provided with a pathway to apply for consent where they exceed the Table 14.2 N leaching standards. However, maximum N leaching standards applied through consent should relate to the natural capital of the land, including The nature and characteristics of the land, having regard to physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, and topography of the property. This proposal may create a period of regulatory uncertainty after 30 June 2023.			
	Method 5-12 Statement #4 Topic 5	Support part	in	Proposals to support catchment initiatives in sustainably managing land and water resources.	Submission should be allowed	
	Policy 14-5 Statement #7 Topic 14	Oppose part	in	Submission proposes to restrict existing intensive farming which is unable to meet Table 14.2 to (ii) 90% of the leaching occurring on the land in the 2012/2013 year ; and iii) The 75th percentile nitrogen leaching loss* for the Surface Water Management Zone*.		
				To put in place a new Nitrogen leaching limit. Submission is inconsistent with the B+LNZ submission and relief sought, in that the maximum N leaching is not related to the		

			natural capital of the land (LUC), but rather the distribution of existing leaching from the catchment. B+LNZ support provisions which provide for existing farming activities to be provided with a pathway to apply for consent where they exceed the Table 14.2 N leaching standards. However, maximum N leaching standards applied through consent should relate to the natural capital of the land, including The nature and characteristics of the land, having regard to physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, and topography of the property.		
	Policy 14-6 Statement 9 Topic 14	Support part	in	Submission is generally consistent with the key points and intent made by B+LNZ in its own submissions	Submission should be allowed
	Table 14.2 Statement 12 Topic 14	Oppose part	in	Submission is inconsistent with the B+LNZ submission and relief sought, in that the submission proposes to restrict application of Table 14.2 up until 30 June 2023, or delete table 14.2 and replace with the greater of a 10% reduction in N or reduce to 75th percentile for existing intensive land uses.	Submission should be disallowed
	Rule 14-1 Statement #13 Topic 14	Oppose part	in	Submission proposes to restrict existing intensive farming which is unable to meet Table 14.2 to (ii) 90% of the leaching occurring on the land in the 2012/2013 year ; and iii)The 75th percentile nitrogen leaching loss* for the Surface Water Management Zone* . To put in place a new Nitrogen leaching limit. Submission is inconsistent with the B+LNZ submission and relief sought, in that the maximum N leaching is not related to the natural capital of the land (LUC), but rather the distribution of existing leaching from the catchment.	Submission should be disallowed

			B+LNZ support provisions which provide for existing farming activities to be provided with a pathway to apply for consent where they exceed the Table 14.2 N leaching standards. However, maximum N leaching standards applied through consent should relate to the natural capital of the land, including The nature and characteristics of the land, having regard to physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, and topography of the property. Submission proposes to restrict existing intensive farming which is unable to meet Table 14.2 to (ii) 90% of the leaching occurring on the land in the 2012/2013 year ; and iii) The 75th percentile nitrogen leaching loss* for the Surface Water Management Zone* . To put in place a new Nitrogen leaching limit. Submission is inconsistent with the B+LNZ submission and relief sought, in that the maximum N leaching is not related to the natural capital of the land (LUC), but rather the distribution of existing leaching from the catchment. B+LNZ support provisions which provide for existing farming activities to be provided with a pathway to apply for consent where they exceed the Table 14.2 N leaching standards. However, maximum N leaching standards applied through consent should relate to the natural capital of the land, including The nature and characteristics of the land, having regard to physical characteristics of the soil including in terms of attenuation capacity, climatic conditions, and topography of the property	Submission should be disallowed
	Rule 14-2 Statement #14 Topic 14	Oppose part in		

