



**FURTHER SUBMISSION ON THE
PROPOSED NATURAL RESOURCES PLAN FOR THE
WELLINGTON REGION**

**FROM
DAIRYNZ
AND
FONTERRA CO-OPERATIVE GROUP LTD**

29 MARCH 2016

**Dairy Sector Further Submissions on the
Proposed Natural Resources Plan
for the Wellington Region**

To: Greater Wellington
Private Bag 11646
Wellington 6142

Name of person making further submission: DairyNZ and Fonterra Co-operative Group

Further submissions in support of/in opposition to submissions on the: Proposed Natural Resources Plan for the Wellington Region

DairyNZ and Fonterra Co-operative Group have an interest in the proposal that is greater than the interest the general public has because:

DairyNZ is the industry good organisation representing New Zealand’s dairy farmers. Funded by a levy on milksolids and through government investment, our purpose is to secure and enhance the profitability, sustainability and competitiveness of New Zealand dairy farming. We deliver value to farmers through leadership, influencing, investing, partnering with other organisations and through our own strategic capability.

Fonterra Co-operative Group (Fonterra) is a global milk processor and dairy exporting company, owned by 10,721 New Zealand dairy farmers. In 2013/2014 Greater Wellington based dairy farmers produced over 61 million kilograms of Milk Solids, contributing significantly to the region’s economy. In 2013/2014 Greater Wellington based dairy farmers produced over 61 million kilograms of Milk Solids, contributing significantly to the region’s economy. For the 13/14 season this production equated to \$518 million revenue to the region at the farm-gate (excluding dividend).

624 people are employed in dairy farming in Greater Wellington region, with most of these based in the South Wairarapa district.¹

Both DairyNZ and Fonterra are concerned that the Proposed Natural Resources Plan for the Wellington Region may have direct and significant impacts on dairy farmers in the Wellington Region.

¹ Dairy’s role in sustaining New Zealand, NZIER 2010 – Dairy Employment Statistics.

DairyNZ and Fonterra jointly support and oppose submissions made on the Proposed Natural Resources Plan for the Wellington Region as detailed, with reasons, in the attached Table 1.

DairyNZ and Fonterra wish to be heard in support of their further submissions. If others make similar submissions, they will consider presenting a joint case at a hearing.

A copy of DairyNZ and Fonterra's further submissions will be served on the persons who made the submissions to which DairyNZ and Fonterra's further submissions relate, within five working days.

I am authorised to make these further submissions on behalf of DairyNZ and Fonterra.

Kay Brown
DairyNZ

Richard Allen
Fonterra Co-operative Group Ltd

29 March 2016

29 March 2016

Address for service of person making further submission:

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TABLE 1

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Wellington Fish and Game Council (Fish and Game) Submitter S308						
Fish and Game	S308 /001	Section 1	<p>Include full suite of values in section 1 and table 1.1 including but not limited to primary recreation, angling, trout fishery and trout spawning, amenity, aesthetic, natural character, natural form and function. At a minimum, identify which waterbodies support the RMA Schedule 3 values and the compulsory values and secondary values set in the NPSFWM.</p> <p>The values identified in the schedules of the plan and as amended by this submission should also be included in table 1.1</p>	Oppose in part	<p>DNZ and Fonterra have concern over potential conflicts between providing for the values of trout fisheries and spawning, and those for indigenous biodiversity given the two can be mutually exclusive.</p> <p>In addition (as noted in their primary submission), there is a potential issue in that this table of values pre-empts the task of the Whaitua committees to develop representative value-mixes tailored to individual catchment communities in collaboration.</p>	Disallow submission
Fish and Game	S308 /009	2.2 Definitions	<p>Amend the definition of natural wetland.</p> <p>(b) areas of <u>artificially created</u> wetland habitat...</p> <p>Schedule may need to be amended to identify wetlands with significant riparian values and the extent of that habitat in relation to sheep exclusion</p>	Oppose	<p>Altering the definition to require equivalent protection for artificial wetlands will prevent the growth of green infrastructure and good practices on-farm that demonstrably improve water quality in natural waterways.</p>	Disallow the submission
Fish and Game	S308 /010	2.2 Definitions	<p>Amend the definition of 'significant natural wetland' to delete reference to 'significant natural wetlands' listed in Schedule F3. Cattle, deer, and pigs should be excluded from natural wetlands greater than 0.1ha.</p> <p>Amend the definition so that sheep should be excluded from wetlands listed in schedule F3.</p> <p>Schedule may need to be amended to identify wetlands with significant riparian values and the extent of that habitat in relation to sheep exclusion.</p>	Oppose in part	<p>Not all natural wetlands will be significant.</p>	Disallow the submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Fish and Game	S308 /022	New objective / Objective O23	<p>Amend Objective 023 or include new objectives in section 3.5 which ensures that: <u>Water quality of aquifers, lakes, rivers, natural wetlands and coastal water is managed to ensure that:</u></p> <p><u>I. Water quality is maintained where the existing water quality is at a level sufficient to support the values of freshwater (listed)</u></p> <p><u>II. Water quality is restored where the existing water quality is not at a level sufficient to support the values of freshwater (listed)</u></p> <p><u>III. Accelerated eutrophication and sedimentation of waterbodies in the region is prevented</u></p> <p><u>IV. The special values of waterbodies protected by water conservation orders are maintained or where degraded are restored</u></p> <p>Such other or further relief as addresses the issues raised by this appeal point</p>	Oppose	The proposed wording is not consistent with the NPS-FM.	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Fish and Game	S308 /023	Objective O24	<p>Amend objective 024 to ensure that: <u>Water quality and quantity of aquifers, lakes, rivers, natural wetlands and the coastal water is managed including through land use provisions to ensure that life supporting capacity and ecosystem health are protected and that water quality and quantity is suitable for primary contact recreation and Maori customary use including by:</u></p> <p><u>(a) maintaining water quality and quantity where it current meets the freshwater objectives (numerical states) set in tables 3.1 to 3.4 and 3.4a</u></p> <p><u>(b) Improving water quality and quantity where it currently is more degraded than the freshwater objectives (numerical state) set in tables 3.1, 3.2, 3.3 and 3.4 and 3.4a are met by 2030</u></p> <p><u>(c) Maintain macroinvertebrate community health where the table 3.4 and 3.4a freshwater attribute states are achieved and where degraded are improved to achieve the freshwater attribute states by 2030</u></p> <p><u>(d) Reduce the frequency and duration of algal and cyanobacteria blooms to achieve the attribute states listed in table 3.1, 3.2, 3.4, and 3.4a by 2030.</u></p>	Oppose in part	<p>Objective O24 as notified appropriately focuses on water quality and it is not considered helpful or workable to broaden its scope to address water quantity as well, when this matter is addressed through other pNRP provisions.</p> <p>DNZ and Fonterra support the pNRP approach for contact recreation/customary use standards which prioritises water bodies for improvement. A blanket requirement for all water bodies to meet pNRP standards by 2030 does not generate a focus on improving those that are the most degraded or allow for Whaitua committees to address water quality issues in their respective catchments with an approach (e.g. timeframes, tools) that are best suited to the catchment objectives.</p>	Disallow submission
Fish and Game	S308 /025	New objective in section 3.5	<p>Include new objective to read:</p> <p>The quality and quantity of groundwater is managed including through land use provisions and rules to ensure that groundwater continues to provide a sustainable source of high quality water, and surface flow recharge, to protect the life supporting capacity, ecological health and cultural and recreational values of freshwater bodies.</p>	Oppose	DNZ and Fonterra have concerns about the proposed regulation of farming land uses to natural-capital based leaching standards as this is not an efficient or effective approach.	Disallow the submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Fish and Game	S308 /026	3.5 Water Quality	Amend tables 3.1 to 3.4 as shown in appendix 4 and 3 of original submission and include new table 3.4a (Freshwater objectives and standards for trout habitat) as shown in appendix 2.	Oppose	DNZ and Fonterra have concerns with the basis for proposed changes to tables 3.1 to 3.4 and the new table 3.4a.	Disallow the submission
Fish and Game	S308 /037	Objective O45	Amend objective O45, and associated policies and rules to ensure that deer, cattle, and pigs are excluded from all waterbodies within 3 years on land under 16 degrees slope; on land over 16 degrees slope and for extensively farmed stock exclude cattle from areas which form a critical source of contaminant and sediment losses or which have sensitive instream values within 5 years. Exclude cattle, deer and pigs from all natural wetlands. Exclude sheep from natural wetlands with significant riparian values.	Oppose in part	DairyNZ (DNZ) and the dairy sector are already addressing stock exclusion through voluntary commitments in the Sustainable Dairying: Water Accord (2013). Objective O45 as drafted is appropriate for managing livestock access with relevance to both voluntary and regulatory mechanisms to achieve water quality objectives.	Disallow submission
Fish and Game	S308 /047	Policy P8	Amend Policy P8 (Beneficial activities) to include activities which result in enhancement of sportfish and gamebird habitats (wetlands, lakes, and rivers), including restoration of spawning and juvenile rearing habitats. Include removal of structures which impede fish migration and flow. Amend clause (h) to ensure that it is only structures which have a beneficial role in enhancing or protecting the habitat and its ecological values which are recognised as beneficial and generally appropriate.	Oppose in part	DNZ and Fonterra express concern about the presumption that sportfish and hunting activities enhance indigenous biodiversity. There is a considerable body of scientific research demonstrating the adverse effect that activities designed to enhance sportfish and gamebird habitats have on indigenous species, particularly native fish.	Disallow submission
Fish and Game	S308 /049	Policy P10	Amend policy so that water quality is managed for primary contact recreation and to achieve the freshwater objectives in section 3 tables including E.coli, periphyton, cyanobacteria, and visual clarity.	Oppose	The proposed amendments do not provide for the Whaitua process to set the limits on recreational indicators at the level of risk they deem appropriate at or above the national bottom line.	Disallow the submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Fish and Game	S308 /056	Policy P32	Delete Policy P32 (Adverse effects on aquatic ecosystem health and mahinga kai) in its entirety	Oppose	This deletion would prevent the ability for actions to be taken that could result in short-term degradation for long-term gain (e.g. disturbance arising from artificial wetland creation; fencing, removal of structures in any natural waterways). GWRC has a duty to manage adverse effects on ecosystem health through the NOF which therefore warrants inclusion of P32.	Disallow the submission
Fish and Game	S308 /061	Policy P96	Include policies which ensure that outcomes relating to water allocation, nitrogen leaching rates, nutrient budgets, livestock exclusion, intensified use in over-allocated catchments, nitrogen and phosphorous trading, and costs of reducing over-allocation are achieved.	Oppose	DNZ and Fonterra do not consider it appropriate for land uses to be subject to blanket natural-capital provisions on diffuse contaminant loss. Good management practices in conjunction with catchment-tailored outcomes set by Whaitua committees and benefitting from a collaborative process are more flexible and will have better environmental outcomes than a one size fits all approach.	Disallow submission
Fish and Game	S308 /066	Policy P99	Create new policies, and amend existing policies to ensure that the provisions stated are achieved (regarding exclusion of livestock and riparian setback distances; see original submission p49-50 for details).	Oppose in part	DNZ and the dairy sector have already recognised the value of stock exclusion through voluntary commitments in the Sustainable Dairying: Water Accord (2013). Policy P99 is considered a practical and appropriate provision for managing livestock access that is consistent with and builds on voluntary mechanisms.	Disallow submission
Fish and Game	S308 /067	Policy P100	Create new policies, and amend existing policies to ensure that the provisions stated are achieved [regarding exclusion of livestock and riparian setback distances; see original submission p49-50 for details].	Oppose in part	Policy P100 is considered a practical and appropriate provision for managing riparian margins, consistent with voluntary commitments by the dairy sector.	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Fish and Game	S308 /068	Policy P101	Create new policies, and amend existing policies to ensure that the provisions stated are achieved [regarding exclusion of livestock and riparian setback distances; see original submission p49-50 for details].	Oppose in part	DNZ and the dairy sector have already recognised the value of riparian margins through voluntary commitments to effective riparian management (e.g., stock-exclusion, planting and maintenance, including detailed on-farm riparian plans), in the Sustainable Dairying: Water Accord (2013). Policy P101 as drafted is considered a practical and appropriate provision for managing riparian margins that is consistent and builds on dairy sector voluntary commitments.	Disallow submission
Fish and Game	S308 /098	New rules	Include new rules which ensure outcomes relating to sustainable nitrogen leaching rates, nutrient budgets, livestock exclusion, intensified use in currently over-allocated sub-catchments, nitrogen and phosphorus trading, allocation principles.	Oppose	DNZ and Fonterra have concerns about the proposed regulation of farming land uses to simplistic natural-capital based leaching standards.	Disallow submission
Fish and Game	S308 /109	Rule R97	Amend the rule to ensure that stock is not permitted to have access to the beds of rivers, lakes, and wetlands, with the exception of extensively farmed stock in the hill country. Establish appropriate buffer zone widths and protection by, either: <ul style="list-style-type: none"> • Fixed setback of 5 m on flat land and 10 m on land >16° slope; or • Use of Wenger (1999) or Barling and Moor (1994) equations 	Oppose in part	DNZ has developed (with all regional authorities and Landcare Research) and promotes (with those regional authorities) nationwide, the use of regionally tailored intelligent riparian guidance (e.g., that accommodates the wide variation in local factors that influence riparian margin effects on water quality). As worded in the pNRP, Rule 97 sits alongside these management practices to integrate with the dairy sector's voluntary commitments in a highly efficient policy approach.	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Fish and Game	S279 /053	Policy P23	Ensure that Policy P23 (Restoring Te Awarua-o-Porirua Harbour, Wellington Harbour (Port Nicholson), and Lake Wairarapa) directs maintenance or where degraded enhancement of freshwater habitats to achieve the freshwater objectives in section 3 tables. Amend so that it refers to the regulation of farming land uses to output based leaching standards and application of GMP to ensure the health of lake Wairarapa is restored to TLI of 3 by 2030. Apply new standards for TLI, chlorophyll, clarity, depth, total P and Total N.	Oppose in part	DNZ and Fonterra have concerns about the proposed regulation of farming land uses to natural-capital based output based leaching standards as past planning processes reliant on those have failed by ignoring key factors affecting loss rates from-farm . The NPS-FM does not require water quality be improved within limits by 2030 and there is neither certainty that this is possible nor a reason why this date is proposed by the submitter.	Disallow the submission
Environmental Defence Society (EDS) (Submitter S110)						
EDS	S110 /003	Section 2.2 (definitions)	Add definition of Mitigation Mitigation is the abatement (repair or lessening of) adverse effects of an activity, undertaken in direct response to and at the same location as that activity.	Oppose	DNZ and Fonterra have concerns that while the term “mitigation” is widely used in resource management, the proposed definition seeks to limit the term as it is used in the RMA.	Disallow the submission
EDS	S110 /012	Rule R97	Require stock exclusion as a minimum for all waterways in permitted activities and remains a matter of consideration in resource consent applications around those waterways with stock access.	Oppose in part	DNZ and the dairy sector recognise the value of riparian margins with extensive voluntary commitments to produce riparian plans that promote stock exclusion and planting for enhanced water quality, in the Sustainable Dairying: Water Accord (2013). Applying the proposed amendments to P97 to all waterways is impractical given the vast number of very small and ephemeral waterways on farms.	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
EDS	S110 /014	Rule R106	Remove control 7 (stock access as a matter of control)	Oppose in part	DNZ and Fonterra recognise the importance of natural wetlands for biodiversity and artificial wetlands for water quality, having already committed to permanent stock exclusion within 3 years of all significant natural wetlands being notified in a regional plan or policy statement. However, excluding stock from every natural wetland with no reference to either its intactness or size, presents a barrier to good management practice as this requires action regardless of any gain for biodiversity and irrespective of other opportunities on-farm for equivalent or greater benefit (e.g. if those wetlands are small, isolated and/or dominated by non-native or non-wetland vegetation they will offer little biodiversity value whether stock-excluded or not, reaffirming the need to identify which natural wetlands are significant from those that are not).	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
EDS	S110 /017	Policy P41, Schedule G	Amend Policy P41 (Managing adverse effects on ecosystems and habitats with significant indigenous biodiversity values) by deleting the second paragraph and inserting the following: a. Avoided in the first instance; b. Where they cannot be avoided, they are remedied; c. Where they cannot be remedied, they are mitigated; and d. Where residual adverse effects remain, that cannot be mitigated they are offset. Amend following paragraph: Proposals for mitigation will be assessed against the principles listed in <u>Part A Schedule G</u> and biodiversity offsets <u>will be assessed against the principles in Part B Schedule G</u> . A precautionary approach shall be used when assessing the potential for adverse effects on ecosystems and habitats with significant indigenous biodiversity values.	Oppose in part	The intent to clarify P41 is supported but DNZ and Fonterra are concerned that the wording is unduly restrictive (e.g. in requiring that all adverse effects on these sites, even if less than minor, are to be avoided in the first instance).	Disallow submission.
Royal Forest and Bird Protection Society of NZ (Forest and Bird) Submitter S353						
Forest & Bird	S353 /001	Objective O24	Add provisions (objectives, policies and rules) that will ensure that the freshwater objectives are met, over time if necessary.	Oppose in part	DNZ and Fonterra support the pNRP approach for contact recreation/customary use standards which prioritises water bodies for improvement. Prescribing that all water bodies meet pNRP standards by an inflexible timeframe does not allow for Whaitua committees to address water quality issues in their respective catchments at the most practicable and effective rate for all catchments in the Region.	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Forest & Bird	S353 /002	Objective O25	<p>a. Add the following to Table 3.4 and 3.5:</p> <p>(i) SIN, which should not exceed 0.444 mg/L in any water body across the Region (bottom line)</p> <p>(ii) DRP, which should not exceed 0.01 mg/L in any water body (bottom line)</p> <p>b. Add provisions (objectives, policies and rules) that will ensure that the freshwater objectives are met, over time if necessary.</p>	Oppose in part	DNZ and Fonterra have concerns that the submitter's proposal to insert new provisions does not allow for Whaitua committees to address water quality issues in their respective catchments at the most practicable and effective rate for all catchments in the region.	Disallow the submission
Forest & Bird	S353 /007	Section 2.2 (definition of GMP)	Delete GMP	Oppose in part	GMP is an effective tool in maintaining or improving water quality and warrants definition to include reference to its continual improvement and inclusion of practices/procedures/tools aimed at achieving environmental outcomes rather than a simple reliance on targets or limits for environmental indicators only. Removal of GMP from the toolkit available to PNRC is also contrary to recommendations by LAWF (2013, 2014) to Government.	Disallow the submission
Forest & Bird	S353 /017	Objective O8	Deletion of consideration for social, economic, cultural and environmental benefits of taking/using water	Oppose in part	This prevents sustainable management by failing to recognise a fundamental value of water (for production) that should be considered in balancing use and protection of water for all community-held values.	Disallow the submission
Forest & Bird	S353 /026	Objective O25	Amend O25 to remove the note	Oppose in part	Removing the ability for Whaitua collaborative processes to determine limits or targets that take precedence over the pNRP prevents community desires for water quality to be met by failing the collaborative process. The suggested change removes clarity around the primacy of collaborative Whaitua processes from the pNRP and encourages further hearings to determine the precedence of the pNRP or Whaitua decisions.	Disallow the submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Forest & Bird	S353 /030	Revision to Table 3.6	Amend to replace narrative with quantitative limits on NO ₃ N for protecting stygofauna	Oppose in part	There is a lack of evidence on what quantitative limits should reliably be for groundwater protection from the submitter.	Disallow the submission
Forest & Bird	S353 /038	Objective O44: Land use impacts on soil and water	Replace with: The adverse effects on soil and water from land use activities is managed to achieve the freshwater objectives in Table 3.4 -3.8.	Oppose	The proposed amendments are not considered necessary given the overarching intent of Objective O25 with respect to safeguarding aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area.	Disallow submission
Forest & Bird	S353 /039	Objective O45	Amend Objective O45 (reduce adverse effects of livestock access) to replace “reduced” with “avoided” when describing adverse effects of stock access.	Oppose in part	DNZ and the dairy sector recognise the value of riparian margins with extensive voluntary commitments to produce riparian plans that promote stock exclusion and planting for enhanced water quality, in the Sustainable Dairying: Water Accord (2013). The feasibility of excluding all livestock from waterways has not been adequately addressed by this submitter nor have the costs and benefits associated with this proposal been identified and quantified.	Disallow the submission
Forest & Bird	S353 /040	Objective O46	Replace with: Discharges to land are managed in a manner that achieves the freshwater objectives in Table 3.4 -3.8	Oppose in part	The proposed amendments are not considered necessary given the overarching intent of Objective O25 with respect to safeguarding aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area.	Disallow submission
Forest & Bird	S353 /056	Policy P7	Delete P7	Oppose in part	Consideration of the beneficial use and development of water is crucial to ensuring balanced, fair and feasible long-term solutions to the sustainable management of water quality and quantity. Failure to consider the full spectrum of values held for a resource is contrary to recommendations of LAWF (2012).	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Forest & Bird	S353 /064	Policy P23	Retain (c) but replace (a) and (b) (a) Managing activities that involve discharges of sediment and other pollutants in their catchments to achieve the Objectives in Tables 3.4 -3.8; (b) Managing erosion prone land and riparian margins in their achieve the Objectives in Tables 3.4 -3.8;	Oppose in part	The proposed amendments are not considered necessary given the overarching intent of Objective O25 with respect to safeguarding aquatic ecosystem health and mahinga kai in freshwater bodies and the coastal marine area.	Disallow submission
Forest & Bird	S353 /075	Policy P36	Replace policy with: Significant adverse effects of use and development on the habitats of indigenous birds in the coastal marine area, wetlands, and beds of rivers and lakes and their margins for breeding, roosting, feeding, and migration are avoided and other effects are avoided remedied or mitigated.	Oppose	The policy amendment is overly general, in applying to all habitats of indigenous birds and all effects on these habitats (even those that are less than minor).	Disallow submission
Forest & Bird	S353 /090	Policy P66 (NPS for FM requirements for discharge consents)	Replace second paragraph with: This policy applies to all discharges (including diffuse discharges by any person or animal) of contaminants to water and all discharges of contaminants onto or into land that may result in that contaminant or, as the result of natural processes from the discharge of that contaminant, any other contaminant enter water. Delete last paragraph (starting Sections (a)...).	Oppose	DNZ are concerned at the proposed application of this policy to diffuse discharges. The proposed amendments specify 'water' rather than 'fresh water'.	Disallow the submission
Forest & Bird	S353 /091	Policy P67	Replace policy with: The adverse effects of discharges of contaminants to land and water are managed so that significant adverse effects are avoided. Where adverse effects are not significant they are managed by: (a) these are avoided in the first instance; (b) where they cannot be avoided, they are remedied; (c) where they cannot be remedied they are mitigated; and	Oppose in part	DNZ and Fonterra have concerns that the proposed amendments delete the practical guidance provided by Policy 67 as to how adverse effects will be minimised.	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
			(d) residual adverse effects that cannot be mitigated, are offset. Move heading 4.8.2 below Policy P67.			
Forest & Bird	S353 /101	Policy P95 Discharges to Land	Amend to ensure provisions properly address diffuse discharges from stock.	Oppose in part	Policy 95 appropriately addresses direct discharges, and is not intended to address diffuse discharges from stock. DNZ and Fonterra consider that continuing adherence to good management practices in conjunction with the collaborative development of Whaitua-based provisions will be more effective in managing the effects of non-point discharges.	Disallow submission
Forest & Bird	S353 /102	Policy P96 managing land use	Rural land use activities are undertaken in a manner consistent with Policy P65 (as amended by Forest and Bird and good management practice.	Oppose in part	The proposed amendments are not necessary. As per the note in Policy P96 explains, the intention of the Whaitua committee process is to develop limits, targets and/or allocation frameworks to manage rural land use, which are incorporated into the Plan.	Disallow submission
Forest & Bird	S353 /105	Policy P99 Livestock access to surface water bodies	Replace with the following policy: Stock shall be excluded from waterbodies except where the adverse effects, including cumulative adverse effects, can be demonstrated as being no more than minor.	Oppose in part	The dairy sector is progressively addressing stock access to waterways in accordance with the Sustainable Dairying: Water Accord (2013) and considers the provisions in the pNRP to be generally practical and appropriate from its relevant experience at undertaking this task nationwide. The submitter's proposed amendments are unduly restrictive, and do not recognise the progressive improvement that existing good management practices are achieving for water quality.	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Forest & Bird	S353 /116	Policy P110 National Policy Statement for Freshwater Management requirements for water takes, damming and diversion	Delete everything after the end of (b)	Oppose	The submitter's proposed amendments do not allow a balanced consideration of measures that will avoid adverse effects.	Disallow submission
Forest & Bird	S353 /124	Policy P128	Amend P128 to permit only transfer of up to 50% of existing consents in over-allocated catchments	Oppose in part	DNZ and Fonterra consider that a 50% surrender rate is unjustified and arbitrary, so could be counter-productive to efficient reallocation.	Disallow the submission
Forest & Bird	S353 /136	Section 5.4.3	Insert new rule(s) relating to agricultural discharges which permit diffuse discharge of nutrients from agricultural activities onto land in circumstances where the nutrient may enter water is a permitted activity provided good management practices are adopted and the discharge is not contributing to a breach of the objectives in tables 3.4-3.8 or the limits and targets. If the freshwater objectives are not being met then consents would be required to ensure that the freshwater objectives are being met.	Oppose in part	DNZ and Fonterra have concerns about the proposed regulation of farming land uses to natural-capital based output leaching standards. The submitter's proposal will not equitably promote more efficient farming. DAIRYNZ	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Forest & Bird	S353 /137	Section 5.4.3	Add new rule for diffuse discharge from stock [to give effect to Policy 96]	Oppose in part	DNZ and Fonterra have concerns about the proposed regulation of farming land uses to natural-capital based output leaching standards. The submitter's proposal will not equitably promote more efficient farming.	Disallow submission
Forest & Bird	S353 /139	Rule R98 Livestock access to the beds of surface water bodies – discretionary activity	Amend Rule 98 so that stock access to the bed of surface water bodies that is not permitted is non-complying.	Oppose	DNZ and Fonterra support and promote voluntary commitments to stock exclusion through the Sustainable Accord: Fresh Water, and support the progressive improvements to stock access embodied in Rule R97. A non-complying activity status for stock access activities that do not comply with Rule R97 is not appropriate as it fails to recognise good management practices and the increasing levels of stock exclusion achieved through voluntary measures.	Disallow submission
Forest & Bird	S353 /154	Rule R126 Placement of a dam in an outstanding water body – non-complying activity	Change activity status for Rules 126 and 127 to prohibited	Oppose	In principle, DNZ and Fonterra do not support prohibitive activity status as there may be circumstances when the effects of a dam can be adequately avoided, remedied or mitigated thereby allowing the activity through a non-complying activity consent would best promote the purpose of the Act.	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Forest & Bird	S353 /155	Rule R127 Reclamation of the beds of rivers and lakes – non-complying activity	Change activity status for Rules 126 and 127 to prohibited	Oppose	In principle, DNZ and Fonterra do not support prohibitive activity status as there may be circumstances when the effects of a dam can be adequately avoided, remedied or mitigated thereby allowing the activity through a non-complying activity consent would best promote the purpose of the Act.	Disallow submission
Kahungunu ki Wairarapa Submitter S300						
Kahungunu ki Wairarapa	S300 /002	Objective O3	Develop greater detail around mahinga kai activities and Maori cultural uses [within the mauri framework]. This could occur with the whitua committees. S300/002	Support in part	In principle, more detail on these uses and activities will assist the community's understanding including in relation to activities in mana whenua sites (Schedule C).	Allow submission to the extent that it will result in greater clarity on activities and uses.
Rangitane o Wairarapa (RoW) Submitter S279						
RoW	S279 /034	Objective O23	Retain the scope of the objective so that it applies to all of the water bodies listed. This objective should extend to the quality of water in modified and artificial water bodies that are connected to natural water bodies but are not otherwise managed as a point source discharge. Amend the objective so that it is clear that the state at which water quality is to be maintained is the state at the time the regional plan review was initiated.	Oppose in part	Proposed amendments are inconsistent with the RMA. Objective O23 as originally worded rightly focuses on natural wetlands.	Disallow submission
RoW	S279 /042	Objective 31	Amend the objective to ensure: A full assessment of outstanding natural features and landscapes in the coastal marine area and in the beds of lakes and rivers is completed based on the full range of values (natural science, sensory and shared or recognised) specifically including tangata whenua values.	Oppose in part	Sites with tangata whenua values have already been identified in the pNRP (Schedules B and C). Lake Wairarapa has been identified as an outstanding water body in Schedule A. However, DNZ and Fonterra have concerns regarding the proposal to include the broader Wairarapa Moana and the	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
			<p>Wairarapa Moana and the Ruamahanga River and its tributaries are recorded as Outstanding Water Bodies.</p> <p>Palliser Bay, including the Lake Onoke, is identified as an area of outstanding natural landscape.</p>		Ruamahanga River and its tributaries in Schedule A.	
RoW	S279 /057	Objective 47	Provide a clear time-bound outcome statement within the objective, such as to avoid sediment-laden runoff to water where it will cause the freshwater objectives and limits in this Plan to be exceeded, and reduce existing sediment discharges to a level that will cause the freshwater objectives and limits to be met by no later than 2030.	Oppose	Although the intent is supported, it is appropriate for the Whaitua Committees to address non-point sources as best they see fit in an approach that is relevant to their respective catchments and values, and to set objectives that are specific to meeting those catchment-specific desired water quality goals.	Disallow submission
RoW	S279 /063	New Objective	<p>Add new objective which sets out outcomes associated with taking, using, damming and diversion of water, including: The taking, use, damming and diversion of fresh water is managed to:</p> <p>a) avoid the transfer of water between water bodies that are not within the same catchment or between catchments.</p> <p>b) Protect the Mauri of rivers, lakes, wetlands, groundwater and other natural resources,</p> <p>c) Recognise and provide for the relationship of Maori, and their culture and traditions, with land, water, waahi tapu, sites of significance and other taonga,</p> <p>d) Avoid adverse effects on Nga Taonga Nui a Kiwa and Outstanding natural landscapes and features (including Outstanding water bodies)</p> <p>e) Safeguard ecosystem health and mahinga kai</p>	Oppose	The proposed new objective is overly broad and prescriptive and including the requirement to “avoid” may have unforeseen and unreasonable consequences in light of the decisions on Environmental Defence Society vs King Salmon.	Disallow submission.

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
RoW	S279 /084	Policy P19	Amend the policy by replacing "minimised" with "avoided"	Oppose	Seeking to avoid adverse effects on the cultural relationship of Maori with air, water and land is unnecessarily restrictive as it requires that all effects are avoided, no matter how minor, extent nor duration.	Disallow submission
RoW	S279 /092	Policy P31	(a) Minimise be replaced with avoid, to reflect the need to preserve natural character and protect it from inappropriate use and development. (b) Minimise to be replaced with avoid (c) Minimise to be replaced with avoid (d) Minimise to be replaced with avoid (e) Support as notified (f) Minimise to be replaced with avoid	Oppose	The policy as worded in the pNRP focuses on maintaining or restoring aquatic ecosystem health and mahinga kai. DNZ and Fonterra are concerned that using the term 'avoid' in an unqualified way means it may be applied strictly having unforeseen and unreasonable consequences. In addition, values can often be safeguarded without the need to "avoid" any effect (as reflected in the notion of attribute bands used in the NPS-FM).	Disallow submission
RoW	S279 /115	New policy	Add a new policy and associated rules that directs how fresh water quality will be maintained in a state at least as good as it was at the time the review of the regional plan was initiated. This policy should be directive in terms of managing both point source and diffuse contributions of contaminants to water.	Oppose in part	For practical reasons (and because Greater Wellington Regional Council have informed DNZ and Fonterra that overall water quality is stable in the region), the state of overall water quality at time of review is equivalent to present and expected to remain so during Whaitua processes. Whaitua Committees will address water quality issues and priorities for their respective catchments.	Disallow submission
RoW	S279 /129	Policy P95	Amend the policy and associated rules to ensure that discharges to land will not occur on sites of significance to mana whenua unless the adverse effects on the values of those sites are avoided.	Oppose	DNZ and Fonterra have concerns at the proposed wording which requires that any effect on the values of those sites is to be avoided.	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
RoW	S279 /175	Rule R59	Add conditions that: water does not drain water from or cause the water level in a natural wetland to be lowered; and the concentration of nutrients (P and N) within the discharge are no greater than the applicable concentration limits for the water body into which the discharge occurs.	Oppose in part	The Whaitua Committees are best able to determine water quality targets and outcomes for water bodies in their whaitua. Although in principle it makes sense for the concentration of nutrients to be no greater in the source water than the receiving water, in practice this absolute requirement may present problems due to e.g. short term aberrations.	Disallow submission.
RoW	S279 /209	Rule R131	Amend the rule to ensure that rivers identified in Schedule C are afforded protection from damming and the diversion of water as a non-complying activity by including a condition in Rule R131 stating the that damming and diversion is not within a river or site identified in Schedule B or C.	Oppose	The proposed non-complying activity status is unduly restrictive. Consent applications for this activity are appropriately assessed on their merits as discretionary activity.	Disallow submission
RoW	S279 /211	Rule R133	Amend the rule, and make associated consequential changes, so that damming or diverting of water from Wairarapa Moana, Lake Pounui, Hapua Korari and the Hidden Lakes, other than damming and diversion that is necessary for ecological or biodiversity enhancement purposes, is a non-complying activity	Oppose in part	Non-complying status is overly restrictive for these activities.	Disallow submission
RoW	S279 /212	Rule R134	Wairarapa Moana, Lake Pounui, Hapua Korari and the Hidden Lakes must be included in R134 to state that the damming and diverting of water is a non-complying activity.	Oppose in part	Non-complying status is overly restrictive for these activities.	Disallow submission
RoW	S279 /216	Policy R.P3	Amend the policy to include specific direction around avoiding adverse effects on ecosystem health and mahinga kai as a result of water takes.	Oppose in part	Policy R.P3 as written addresses these matters implicitly.	Disallow submission.
RoW	S279 /218	Rule R.R3	The rule should be amended so that it does not exclude takes and uses of water where the limits specified in the Plan are exceeded.	Oppose in part	DNZ and Fonterra are concerned that amendments to Rule R.R3 may impact on the take and use of water below minimum flows for specified uses (e.g. for the health needs of people).	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
RoW	S279 /225	New schedule	Add a new schedule of areas of outstanding and high natural character. Include objectives, policies, rules and other methods that ensure that the natural character of the areas within the schedule is preserved and protected from inappropriate use and development. Wairarapa Moana should be identified as an area of outstanding natural character and included in the Schedule.	Oppose in part	DNZ and Fonterra support the identification and mapping of outstanding natural character in the coastal marine area. However it is not possible to comment on content of the new schedule or the related provisions as the submitter has not provided specific wording.	Disallow submission
RoW	S279 /226	New schedule	Add a new schedule for Outstanding Natural Features and Outstanding Natural landscapes. These should be identified and included in a new schedule, with associated maps. As a minimum, Wairarapa Moana should be identified.	Support in part	DNZ and Fonterra support in principle the identification and mapping of outstanding natural features. However it is not possible to comment on content of the new schedule or the related provisions as the submitter has not provided specific wording.	Disallow submission
Atiawa ki Whakarongotai (AkW) Submitter S398						
AkW	S398 /002	New provisions	Provide individual provisions for ecosystem health and mahinga kai.	Support in part	DNZ and Fonterra support in principle the separation of provisions for ecosystem health and mahinga kai (subject to review of specific wording of provisions, parameter levels and their usability for the community), if this is important to iwi. However it is suggested that these matters may be best dealt with at a Whaitua level given the diversity of history and values underpinning different hapū expectations of mahinga kai.	Allow submission to the extent that the Whaitua Committees are able to develop provisions specifically for mahinga kai.
Nga Hapu O Otaki (Submitter S309)						
Nga Hapu O Otaki	S309 /032	Policy P99	Include Schedule B in Policy P99 (Livestock access to surface water bodies)	Oppose in part	DNZ and Fonterra support the identification of sites of significance to Maori but are concerned that there is confusion in this and other submissions with references to and potential conflicts between Schedules B and C.	Disallow submission

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Nga Hapu O Otaki	S309 /036	Rule R67	Amend rule (Discharges inside sites of significance – non-complying) that Schedule B and C sites are included into subsection (a).	Oppose	The submitter's proposed amendments are overly restrictive given the extent of Schedules B and C and the non-complying activity status.	Disallow submission
Nga Hapu O Otaki	S309 /039	Rule R97	Amend subsection (b) to include Nga Taonga Nui a Kiwa (Schedule B)	Support in part	DNZ and Fonterra support the identification of sites of significance to Maori but are concerned that there is confusion in this and other submissions with references to and potential conflicts between Schedules B and C.	Disallow submission
Nga Hapu O Otaki	S309 /042	Rule R42	Amend value of minor discharges to 30g/m3 in all waterways. Include Nga Taonga Nui a Kiwa (schedule B) in subsections (b) and (i)	Oppose	The submitter's proposed amendments are overly restrictive for a permitted activity rule.	Disallow submission
Nga Hapu O Otaki	S309 /043	Schedule B	Areas within Schedule B are managed in reference to mana whenua values.	Oppose	It is unclear what is meant by the submitter, and the potential for confusion between Schedule B and C sites is of concern.	Disallow submission
Nga Hapu O Otaki	S309 /045	Method M6	Amend method "'Wellington Regional Council in partnership with mana whenua will develop an integrated....'	Support in part	This is consistent with council collaborative intent and would be strengthened with a similar involvement from landowners.	Allow submission providing it includes collaboration with other landowners.
Wellington Water Ltd Submitter S135						
Wgtn Water Ltd	S135 /116	Policy P120	Remove the term "is appropriate" and re-word to be certain, such as, "Water may be taken for storage outside a river bed at flows above the median flow provided Policy P117 is satisfied".	Support	The proposed amendments clarify the intention of Policy P120.	Allow submission
Fertiliser Association NZ (FANZ) Submitter S302						
FANZ	S302 /066	Schedule F3	FANZ seeks that consideration is given to the potential conflict between Schedule F1 and Schedule I	Support	For the reason stated by the submitter	Allow submission
Ravensdown Submitter S310						

Submitter Name	Sub. Ref.	PNRP Reference	Part(s) of the submission supported or opposed	Position	Reasons	Relief Sought
Ravensdown	S310/042	Rule R42	Provide an interim rule regime providing for farming activities until the whitua process introduces limits into the NRP by a plan change, but either: <ul style="list-style-type: none"> Amending Rule R42 to include provision for farming activities; Introduce a new rule that specifically provides for farming activities. 	Support in part	The relief sought by the submitter may be useful if there is currently any doubt about the permitted status of farming activities.	Allow submission.
Irrigation NZ Submitter S306						
Irrigation NZ	S306/011	Policy P115	Amend Policy P115(c) as follows: (d) <u>Category A groundwater which, from 1st September 2025, shall be required to reduce the take by 50% of the amount consented above minimum flows, and</u>	Support	Relief sought may be a sensible transition for the take and use of water below minimum flows or lake levels established in Whitua Chapters.	Allow submission
Irrigation NZ	S306/019	Schedule P (Classifying and managing groundwater and surface water connectivity)	This Schedule will only become operative once GWRC has: <ul style="list-style-type: none"> Updated its groundwater model so it is 'fit for purpose' A review process has been undertaken with existing consent holders to categorise their takes. 	Support	The relief sought will ensure that Schedule P is robust and reflects the existing situation.	Allow submission