

Report to the Collaborative Stakeholder Group – for Agreement and Approval

File No: 23 10 02
Date: 9 October 2015
To: Collaborative Stakeholder Group
From: CSG Independent Chairperson – Bill Wasley
Subject: Possible catchment wide rules and how they were developed
Section: **Agreement and Approval**

Disclaimer

This report has been prepared by Waikato Regional Council policy advisors for the use of Collaborative Stakeholder Group Healthy Rivers: Wai Ora Project as a reference document and as such does not constitute Council's policy.

1 Purpose

The purpose of this report is to provide the Collaborative Stakeholder Group (CSG) with a list of possible catchment wide rules. These are broken into two groups:

1. Possible Waikato and Waipa catchment wide rules which are developed enough to consult on during the community engagement period 27th October to 13th November 2015.
2. Possible catchment wide rules which need to be further developed.

Recommendation:

1. That the report [Possible catchment wide rules and how they were developed] (Doc #3494533 dated 9 October 2015) be received, and
2. That the Collaborative Stakeholder Group confirm:
 - a. That this report contains a complete list of the possible catchment wide rules CSG are considering.
 - b. That they will use the list of catchment wide rules contained in Section 3.1 and Table 1, subject to amendments by CSG, to consult with the community on during the community engagement period 27th October to 13th November 2015.
 - c. That Section 3.2 of this report contains a list of activities that should continue to be investigated in more detail.

2 Introduction and navigating this report

CSG are about to go out to the community and consult on water quality policies and solutions. This report provides a list of catchment wide rules, with different levels of detail on how they might look.

The report 'Policy options – CSG decisions needed to meet proposed amended timeline' DM#3572653 provides an overview of the policy approaches being investigated and includes, in Table 1, the types of activities that have been included in the catchment wide rules policy approach and which of the four contaminants the rule is trying to address.

This report starts with a simple list of catchment wide rules, which are broken down into two groups:

1. Possible catchment wide rules which are **developed enough to consult on**. These are either completely new rules (or very different to existing rules), or are tweaks/adding new conditions to existing rules in the Waikato Regional Plan.
2. Possible catchment wide rules which CSG or the scenario modelling indicated would be important to consider, but at this stage there is **not a lot of detail on them** for the CSG to consult with the community on. Staff can continue investigating these for CSG to consider later in the year.

Next, there is a summary table (Table 1) of all the catchment wide rules, noting what they are, how they fit with what is currently in the Waikato Regional Plan and why the changes were suggested.

The appendices contain more detail on the development of catchment wide rules and policy options:

- Appendix 1 contains the policy options which have been set aside for now, and why.
- Appendix 2 contains a list of all the catchment wide rules discussions at CSG workshops and with sector representatives in between meetings¹.
- Appendix 3 contains detailed tables of the ALL the policy approaches, including how they related to the Waikato Regional Plan and industry programmes. This is an ongoing work-in-progress.

3 Possible catchment wide rules

3.1 Rules to consult on

The following catchment wide rules have been developed enough for the CSG to be able to consult with the community on. The rules relate to what is currently in the Waikato Regional Plan in two ways:

Completely new rules (or very different to existing rules)

- Stock access to river and lakes beds
- Managing intensification and new entrants
- Setbacks
- Catch-all rule to exclude low intensity land uses from some rules

¹ CSG thought it would be helpful to have a list of all the discussions policy have had with sector representatives in between meetings. For completeness, and to track some of the reasons why different rules have been included, staff have included a list of all the discussions on catchment wide rules, both at CSG workshops and in between meetings. Information will also be fed back by sector representatives at workshops in the 'feedback from our networks' session.

Tweaks/adding new conditions to existing rules or in the Waikato Regional Plan

- Forestry harvesting
- Roding and tracking
- Vegetation clearance
- Cultivation
- Farm animal effluent
- Fertiliser

These possible rules are explained in Table 1.

3.2 Activities to investigate further

The following activities have been raised by CSG or the scenario modelling as important activities to consider. At this stage there is not a lot of detail on these activities for the CSG to consult with the community on. Staff can continue investigating these for CSG (once the CSG tell staff what they want the rules to manage/achieve) to consider later in the year:

- Wetlands
- Riparian planting
- Discharges from drains
- Land contouring (overburden)
- Offal holes
- Point sources

Table 1: Possible catchment wide rules to consult on

DISCLAIMER: This guide to conditions does not represent the full details of the Waikato Regional Plan (WRP) rules or possible rules in the Healthy Rivers: Wai Ora project. They are provided as a general guide to the flavour of the existing or possible new rules. This is not an exhaustive list of rules in the WRP but those felt relevant to the activities being considered to date by the CSG. Current non-regulatory policies in the WRP are not included in this list. There has not yet been full technical advice on proposed rules and no legal check.

NOTE Current WRP rules in plain font and *possible new rules or conditions in italics*.

Activity	Classification	Comment/Key Condition	Reference	Basis for new rule/change
Stock access to surface water – river and lake bed disturbances				
Deer and cattle in water and Effects of stock crossing	Prohibited	<p>By [date], it is a prohibited activity to allow dairy, beef meat cattle, domestic farmed deer, domestic farmed goats and horses unrestricted access to a river or lake bed.</p> <p><i>This rules applies to all land in the Waikato and Waipa River catchments excluding [insert descriptor of cut-off/threshold e.g. of Land Use Class e.g. class 6e or slope greater than 25 degrees]</i></p> <p><i>In the context of this rule unrestricted access means the ability for stock to enter a river or lake bed without limitation, and includes moving through the bed of a river or lake without provision for regular stock crossing in place.</i></p> <p>Advisory notes: <i>Practical means of compliance with Rule X.X.X include, but are not limited to:</i></p> <ul style="list-style-type: none"> <i>a) The use of bridges or culverts</i> <i>b) Fencing of riparian areas</i> <i>c) The use of gates in conjunction with fencing</i> <i>d) Provisions of troughs for livestock watering in adjacent fenced pasture areas</i> <i>e) Construction of crossings so as to be direct a route across the bed of the river or lake as practicable</i> <i>f) Construction of hard entry and exit points at livestock crossing sites.</i> <p><i>Refer to sections 4.2.8 Bridges, 4.2.9 Culverts and 4.2.11 Fords for rule requirements when constructing these structures.</i></p>	<p><i>New rule</i></p> <p><i>Replaces existing stock in water bodies rule in WRP</i></p>	<p>CSG have discussed which stock should be excluded. The effects based approach in the existing Waikato Regional Plan is difficult for farmers to know if they are compliant and for council to assess.</p> <p>Staff developed a new rule based on the thresholds indentified by CSG. The basis for prohibited status is that there is a general expectation that stock in waterways should not be allowed. There should be provision for stock crossings but the effects of that need to be managed.</p>
Managing intensification and new entrants – non-point sources discharges				
Managing intensification and new entrants	-	<p><i>Managing intensification within a land use and conversion from one land use to a more intensive land use.</i></p> <p><i>This catchment wide rule depends on what other policy approaches CSG decide on. For instance, if a property level limit for N is set then this issue is dealt with.</i></p> <p><i>CSG may also wish to consider if this rule applies only in certain parts of the catchment.</i></p>	<p><i>New rule</i></p>	<p>A key mitigation to reduce contaminants is de-intensification. If land uses are able to increase discharges then the progress made by the other mitigations may be negated by intensification within land uses and changes in land use to more intensive, and higher discharging, land uses.</p>
Setbacks – accelerated erosion				
Setbacks from river and lake beds	-	<p>Currently the WRP requires a setbacks as part of a permitted activity as follows: 5m setback from water when re-planting forestry (chapter 5) 2m setback from water when cultivating land (chapter 5)</p> <p>And as a condition of consent: 3m setback and riparian management as part of a dairy shed and milk cooling water take (chapter 3).</p> <p>If cultivating or clearing vegetation within the catchment of, or 10m of (whichever is lesser), a cave or sinkhole then it is a discretionary activity (chapter 5).</p> <p><i>All productive use of the land for forestry operations, farming or cultivation must be set back from river or lake beds.</i></p>	<p>Currently chapter 5 WRP forestry, vegetation clearance and cultivation</p> <p>Currently chapter 3 WRP dairy shed water takes</p> <p><i>New rule for other land uses</i></p>	<p>CSG suggested.</p> <p>This is a mitigation in the modelling which is utilised in the steps towards achieve Scenario 1.</p> <p>This would make a setback a requirement across all land uses.</p>

Activity	Classification	Comment/Key Condition	Reference	Basis for new rule/change
		<p><i>This can be incorporated in a number of ways:</i></p> <ul style="list-style-type: none"> • <i>Write a general rule which covers all land uses, or</i> • <i>Specify the same setback but in different rules for different sectors e.g.</i> <ul style="list-style-type: none"> ○ <i>In new prohibited activity stock exclusion rule</i> ○ <i>In a new clause for forestry, see below</i> ○ <i>Changing the existing setback for cultivation</i> 		
Exclude low intensity land uses from some rules – non-point sources discharges				
<i>Catch-all rule to exclude low intensity land uses from some rules</i>	Permitted	<p><i>This rule will depend mainly on the other policy approaches that CSG decides on. For instance, it may be to exclude low intensity land uses from a property level limit of N, or from having to prepare a tailored property plan.</i></p> <p><i>CSG would also decide if low intensity land uses are excluded from any catchment wide rules.</i></p>	New rule	CSG suggested
Forestry harvesting – accelerated erosion				
Harvesting of production forestry	Permitted	<p>Forestry harvesting and replanting is permitted provided it complies with a number of conditions.</p> <p><i>Add to the current conditions in Chapter 5 to now also require a Harvest Plan, a Sediment and Erosion Control Plan, to notify Council prior to commencement of works and to provide a copy of the plan(s) to Council.</i></p>	<p>Currently chapter 5 WRP</p> <p><i>New conditions added</i></p>	CSG sector representative for forestry suggested.
Roading and tracking – accelerated erosion				
Roading and tracking	Permitted activity Controlled and discretionally	<p>Roading and tracking is permitted provided it complies with a number of conditions.</p> <p>If roading or tracking is undertaken in a high risk erosion area it is a controlled or discretionary above certain thresholds.</p> <p><i>Add to the current conditions in Chapter 5 to now also require an Erosion and Sediment Control Plan for earthworks.</i></p>	<p>Currently chapter 5 WRP</p> <p><i>New conditions added</i></p>	Suggestion from CSG to encourage better practice earthworks through erosion and sediment control plans.
Cultivation – accelerated erosion				
Cultivation	Permitted activity Controlled activity	<p>Soil cultivation is permitted adjacent to water bodies as long as it is not undertaken closer than 2 metres from a bed of a river or lake and as long as the suspended solids standard is not breached (this is linked to the water classes standards).</p> <p>Soil cultivation is a controlled activity if it occurs within 2m of a bed of a river or lake.</p> <p><i>Add to the current conditions in Chapter 5 to now also require an Erosion and Sediment Control Plan for cultivation.</i></p>	<p>Currently chapter 5 WRC</p> <p><i>New conditions added</i></p>	Suggestion from CSG to encourage better practice for cultivation through erosion and sediment control plans.
Farm animal effluent – discharges				
Farm animal effluent	Discharge of treated farm animal effluent to land: Permitted activity and	<p>Discharging treated animal effluent from sheds, feed pads and stand off pads is permitted as long as the comply with certain conditions including no direct discharges to water or effluent entering surface water, treatment and storage of effluent and application rate.</p> <p>If those conditions cannot be met it is a discretionary activity.</p>	Currently chapter 3.5 WRP	<p>Suggestion from CSG to have no more direct discharges to water from effluent ponds (unless there is a very good reason why it can't be land based disposal).</p> <p>Staff implementation experience is that some parameters in the existing rules are difficult to monitor so difficult for the regulated and</p>

Activity	Classification	Comment/Key Condition	Reference	Basis for new rule/change
	Discretionary activity	Discharging treated effluent to water is a discretionary activity (for example 2 pond systems).		regulator to determine compliance. Current gaps in the rule around capture of solids from infrastructure and application loading.
	Discharge of treated farm animal effluent to water: Discretionary	You cannot apply for a consent to discharge untreated animal effluent.		
	Discharge of untreated effluent: Prohibited			
	Permitted	<i>Change conditions in the permitted activity rule (for example the application depth, new level would need to be based on technical advice.)</i>	<i>New conditions added</i>	
	Discharge of treated farm animal effluent to water: Non-complying	<i>Rules that promote phasing out of inappropriate systems and phasing out of consents for direct discharges to water.</i>	<i>Possible new activity class</i>	
Fertiliser – non-point sources discharges				
Fertiliser application	Permitted activity	Fertiliser application is permitted provided the conditions are met, which include no direct application to water, management of the odour and application drift, application standards, and a requirement to prepare a nutrient management plan where rates greater than 60kg/N/year or if fertiliser is being applied to the same area of land that had farm animal effluent applied to it within the preceding 12 months. <i>This catchment wide rule depends on what other policy approaches CSG decide on. For instance, if a property level limit for N is set or a tailored property plan is required this may over-ride this rule.</i> <i>Alternatively there could be a separate stand-alone catchment wide rule, for example to guide the development of a tailored property plan.</i>	Currently chapter 3.9 WRP <i>New rule or new conditions added</i>	Staff implementation experience is that some parameters in the existing rules are difficult to monitor, and so difficult for the regulated and regulator to determine compliance.

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Appendix 1: Policy options set aside for now

Appendix 2: Discussions on catchment wide rules

Appendix 3: Detail on all policy approaches

References

Collaborative Stakeholder Group Workshop 14 Notes. 10 and 11th August 2015, DM#3471459.

Doole, G, Elliot, S and McDonald (2015). Economic evaluation of scenarios for water-quality improvements in the Waikato and Waipa River catchments. Assessment of first set of scenarios. Confidential draft report issues to CSG only. DM#3483793

Waikato Regional Council, 2015a. Assessment of policy instruments for sediment using the Draft CSG Policy Selection Criteria. Agreement and Approval Report dated 25 May 2015. DM#3258508.

Waikato Regional Council, (online version) Waikato Regional Plan, <http://www.waikatoregion.govt.nz/Council/Policy-and-plans/Rules-and-regulation/Regional-Plan/Waikato-Regional-Plan/>

Waikato Regional Council 2015. Exploring industry farm plans as a policy option; including industry-supported farm plan with regulatory backstop. Agreement and Approval Report dated 27 July 2015. DM#3454905.

Waikato Regional Council 2015. Policy options for sediment, microbes, nitrogen and phosphorus. Agreement and Approval report dated 22 June 2015. DM#3425911.

Waikato Regional Council, 2015. Policy option of a property-level limit for nitrogen and phosphorus Agreement and Approval Report dated 24 August 2015 DM#3476854

Waikato Regional Council 2015. Policy options – CSG decisions needed to meet proposed amended timeline Agreement and Approvals report. CSG workshop 17. DM#3572653

Waikato Regional Council, 2015. Powerpoint presentation Justine Young CSG 15. Policy options session today. DM#3497378.

Waikato Regional Council, 2015. Update: Summary of policy options being investigated Agreement and Approval Report dated 24 August 2015. DM#3482625.

Waikato Regional Council, 2015. Waikato and Waipa catchment wide rules to investigate as part of policy options for sediment, microbes, nitrogen and phosphorus. Agreement and Approval Report dated 27 July 2015. DM#3450520

Appendix 1 – Policy options set aside for now

Table 2: Policy options which have been set aside for now

Workshop	Policy options which were set aside	Reasons why	Relevant reports and workshop notes
Set aside by staff and reported to CSG at workshop 12 4-5 June 2015	Tax on fertiliser	<ul style="list-style-type: none"> • It is difficult to measure the impact of the tax on outcomes (e.g. if there are reductions in use of fertiliser). • It is difficult to determine how effective the tax on fertiliser would be e.g. different effects in different areas and this might not align with where reduction may have most effect. • Landowners could take other actions/substitute inputs that result in other discharges. • Ideally you would want to tax all sources of N, P, not just fertiliser. • It would be difficult to levy at a property level. • The tax level would need to be adjusted each year. • It is unclear if it is possible to administer at a catchment level. 	Policy options for sediment, microbes, nitrogen and phosphorus #3425911
Workshop 13 2-3 July 2015	In-stream limit for sediment Detailed design of rules and subsidies – tender, alternative land uses, permanent retirement of high risk land	<ul style="list-style-type: none"> • It is not possible to easily and cheaply measure or model the contribution of sediment from a property • It is hard for a landholder to know if they are compliant with the standard or not • Compliance with the rule can only happen after the fact, you need to be there at the right time, and know what the water quality was like before the discharge event. • For simplification, these options are considered as detail of catchment wide rules, subsidies and tailored farm plans. 	Policy options for sediment, microbes, nitrogen and phosphorus #3425911 Workshop notes #3439320
Workshop 15 26-27 August 2015	Property level limit based on Olsen P	<ul style="list-style-type: none"> • Olsen P is a measure of fertility and depended to how P retentive the soils are so would need to be context specific, • Olsen P is not a measure of how much leaching of P from the property but P available to the plant, • Implementation and enforcement efforts would be considerable and were not considered the best value for use of the implementation costs, • Measurement regime would be important and therefore difficult in a property limit as the Olsen P varies widely across paddocks, • Economic optimum and the agronomic limit are different. 	Policy report: Update: Summary of policy options being investigated. #3482625 Workshop notes: #3490222

Appendix 2 – Discussions on catchment wide rules

Table 3: Discussions on catchment wide rules at CSG workshops

Policy options			
Workshop	Description	Relevant report	Possible policy options considered at this point
Workshop 12 (4-5 June 2015)	<p>Overview of possible sediment policy options.</p> <p>Workshop activity on measurability, potential for general rules and options to deal with and if not general rules what a tailored approach might look like.</p>	<p>Assessment of policy instruments for sediment using the Draft CSG Policy Selection Criteria. DM#3258508</p>	<ul style="list-style-type: none"> • In stream limit • Existing and new catchment wide rules practices/ technologies • Financial subsidies for practices/ technologies • Rules requiring property plan • Tender land management agreements • Financial subsidies – zoning land use • Rules retirement land
Workshop 13 (2-3 July 2015)	<p>Overview of possible sediment, microbes, nitrogen and phosphorous policy options</p> <p>Workshop activity on measurability, potential for general rules and options to deal with and if not general rules what a tailored approach might look like.</p>	<p>Policy options for sediment, microbes, nitrogen and phosphorus. DM#3425911.</p>	<p>Options above and:</p> <ul style="list-style-type: none"> • Existing and new catchment wide rules practices/ technologies • Financial subsidies for practices/ technologies • Rules requiring property plan • Rules that require property plan – provide as part of industry assurance/ audit program • Property limit - Olsen P • Property limit - N Cap and Trade/offset for N
Workshop 14 (10-11 August 2015)	<p>Present back an update on the policy options for all contaminants which staff will investigate further.</p> <p>Options included more detail on property plans.</p> <p>Initial session on allocation and cost sharing.</p>	<p>Waikato and Waipa catchment wide Rules to investigate as part of policy options for sediment, microbes, nitrogen and phosphorus DM#3450520</p> <p>Exploring farm plans as a policy options including industry supported farm plan and regulatory backstop DM#3454905.</p> <p>Initial allocation options to permit discharges of contaminants at a property level and the sharing of costs. DM#3109567</p>	<ul style="list-style-type: none"> • Catchment wide rules: exclude stock, stock crossing infrastructure, setbacks, winter cropping, livestock on steep slopes, erosion risk area, eroding sediment sources • Tailored property plans <ul style="list-style-type: none"> ○ industry assurance scheme including auditing or industry supported property plans, ○ Consent with property plan <p>Not decided on:</p> <ul style="list-style-type: none"> • Property level limit, N or P • Property limit and trading
Workshop 15 (27 th August 2015)	<p>CSG received an update on the policy options for all contaminants which staff will investigate further.</p> <p>Options included more information on a property limit policy option for N and P.</p>	<p>Update: Summary of policy options being investigated DM#3482625.</p> <p>Policy option of a property-level limit for nitrogen and phosphorus DM#3476854.</p>	<ul style="list-style-type: none"> • Property level limit, N limit using Overseer • Property Limit Olsen P • Catchment wide rules: earthworks, forestry harvesting, vegetation clearance, setbacks, forestry replanting, overburden, offal holes, cattle in water, effluent

	Feedback from CSG on options and practices/ activities to that might fall under each policy option		<ul style="list-style-type: none"> • CSG directed these activities to be added: cultivation, Olsen P, property drains, fertiliser, riparian planting, forestry replanting setbacks, general catchall for low intensity land uses • Tailored property plans: Winter grazing, grazing, livestock on steep slopes, Eroding sediment sources, erosion risk areas, earthworks and Nutrient management/ budgeting • CSG directed these activities to be added: cultivation, stock exclusion and riparian, setbacks, forestry harvesting plans and erosion plans, and land use classes to farm to land capability, riparian planting, separate out winter cropping from that near water to winter cropping on property, change prevent erosion from risk areas to manage erosion from risk areas
Workshop 16a (8 September)	Presentation that focused on an implementer's perspective of taking a voluntary property plan approach, such as the Waipa Catchment Plan (WCP), further into a regulatory approach.	Translating the Waipa Catchment Plan concepts into Plan Change 1 DM#3500848	<ul style="list-style-type: none"> • Catchment wide rules for some activities • Property plans
Workshop 16b	Report back from CSG Overseer working group on property limit	Options for using Overseer model to manage nitrogen and phosphorus at a property-level DM#3507568	<ul style="list-style-type: none"> • N and P Property limit - Overseer

Table 4: Discussion with sector reps between workshops – mix of catchment wide rules and tailored property plan discussions

Date	Sector	Discussion with council staff
17 July 2015	Forestry	With the CSG forestry representative to explore the forestry sector proposal in more detail*. Helped inform report to CSG – DM# 3454905.
22 July 2015	Sheep and beef	With sheep and beef CSG representative and delegate and Beef and LambNZ staff on the detail of industry ideas on incorporating their approaches into the Plan Change*. - Helped inform report to CSG – DM#3454905.
22 July 2015	Dairy	Brief phone conversation with the CSG dairy delegate on incorporating their ideas on industry assurance scheme into the Plan Change.
6 August 2015	Dairy	Staff attended the dairy sector meeting – BAU Council meeting. This included an update on the project timeline and an offer from industry to share Sustainable Milk Plan information as part of the development of the policy approach on tailored property plans.
14 August 2015	Horticulture/ arable	Staff have had a session with the Horticulture Arable sector meeting – BAU Council meeting. These initial conversations have not occurred with the horticulture representative.
21 August 2015	Dairy	Conversation with DairyNZ staff involved in the Sustainable Milk Program to explore some of the learning's from the roll out of the SMP program that might help the CSG and council staff identify implementation considerations.
1 September 2015	Forestry	Discussion with sector representative on catchment wide rules including stock exclusion, setbacks and sediment control devices thinking about rule consistency across sectors.
25 September 2015	Dairy	Conversation with DairyNZ staff and WRC implementation staff on property plans, specifically the processes and support needed to implement and monitor Sustainable Milk Plan's as part of a plan change.

*As noted in the report on property plans (WRC 2015).

Appendix 3 – Detail on policy approaches

Current Waikato Regional Plan rules, industry equivalents and options proposed by CSG

Table 5: Possible approach - Property Level Limit

Practice	General interpretation of the sorts of rules CSG has discussed	Is there an equivalent requirement or suggested good practice by an industry body? ²	Does the WRP generally require the technology or practice in the same way the CSG has asked for?	Current rule categories	Overview of key conditions that must be met for the current rules ³	Current non-regulatory methods in the Waikato Regional Plan
N limit	Property level N limit		Yes but only in Taupo catchment. This approach not only includes a property limit, but cap and market for trading N	<p>3.10.5.3 Controlled Activity – Nitrogen Leaching Farming Activities</p> <p>3.10.5.7 Controlled Activity – Offsetting (Trading) a Nitrogen Discharge Allowance for high leaching land</p> <p>3.10.5.9 Non Complying Rule – Land uses that do not comply with Rules 3.10.5.1-3.10.5.8</p> <p>3.10.5.10 Permitted Rule – Nitrogen, effluent, and fertiliser discharges associated with Land Uses authorised under rules 3.10.5.1 to 3.10.5.9</p> <p>3.10.5.11 Permitted Rule – Discharge to air associated with Land Uses authorised under rules 3.10.5.1 to 3.10.5.9</p>	<p>LAKE TAUPO CATCHMENT</p> <p>Land holders in the Lake Taupo catchment need to be benchmarked for 1 year of their choice between 2001-2005. This discharge of N is allocated to them (grandparented) as a Nitrogen Discharge Allowance (NDA).</p> <p>A Nutrient Management Plan (NMP) must be prepared for the property, in which total N discharges must be less than the cap determined through benchmarking.</p> <p>Overseer version 5.4.3 must be used for benchmarking, NMP and monitoring.</p> <p>Landholders are monitored both to the cap and to the actions stated in the NMP.</p> <p>If a landholder wishes to alter the NDA by trading or offsetting their consent needs to be changed to reflect this.</p> <p>Landholders are able to choose which practices and enterprises suit their farm, as long as the total N leaching in their NMP does not exceed the NDA.</p>	<p>3.10.4.1 Taupo-nui-a-tia- Action Plan</p> <p>3.10.4.2 Taupo District Council Long Term Council Community Plan</p> <p>3.10.4.3 Monitoring and Review of Lake Taupo Water Quality</p> <p>3.10.4.4 Tangata Whenua Partnership</p> <p>3.10.4.5 Research into Development and Implementation Markets for Nitrogen Trading (or offsetting)</p> <p>3.10.4.6 Recording of Non-Complying Consents Granted</p> <p>3.10.4.7 Wastewater Management</p> <p>3.10.4.8 Integrated Management of Wastewater</p> <p>3.10.4.9 Public fund</p> <p>3.10.4.10 Review of Effectiveness of Public Fund</p> <p>3.10.4.11 Education, Advice and Extension for Rural Land Use Activities under a Nitrogen Cap</p> <p>3.10.4.12 Landowner Involvement in Catchment Management</p> <p>3.10.4.13 Education for Rural Land Activities on Phosphorus Management</p>

² At the moment, only included comments on the Sustainable Dairying Water Accord SDWA and the Beef and LambNZ Land Environment Plan 1. I have looked at but not included the “Good management Practice target Waikato” publication developed by DairyNZ Version 2 4 June 2015. This is intended as a guiding document to good management practices and is being used in development of Sustainable Milk Plans.

³ These are summarises interpretations o the existing rules in the WRP - refer to actual rule in the plan for full wordingl of the rules

Current Waikato Regional Plan rules, industry equivalents and options proposed by CSG

Table 6: Possible catchment wide rules

Practice	General interpretation of the sorts of rules CSG has discussed	Is there an equivalent requirement or suggested good practice by an industry body? ⁴	Does the WRP generally require the technology or practice in the same way the CSG has asked for?	Current rule categories	Overview of key conditions that must be met for the current rules	Current non-regulatory	Possible Changes to rules to make them address farming activities more directly/in a clear and unambiguous way
Deer and cattle in water and effects of stock crossing water bodies	Rules to exclude deer and cattle (including dairy cows) from water	<p>Dairy - Yes Sustainable Dairying Water Accord SDWA</p> <p>Stock must be excluded from all permanent waterways (1m wide, 30cm deep)</p> <p>100% dairy farms must exclude dairy cattle from significant (mapped in WRP) waterways & wetlands</p> <p>Drystock - No</p>	<p>Yes for keeping stock out (effects-based rule)</p> <p>Yes for managing effects of stream fords / access to crossing streams etc (effects-based rule - i.e. meet relevant suspended solids standard, plus PA condition about minimising time spent crossing)</p> <p>Also note in relation to water takes:</p> <p>3.3.4.19 – stock exclusion, fencing where take water – and riparian management plan, 3m setback – mitigate the effects. Fencing within 3 years and planting over the term of the consent</p> <p>3.3.4.28 Standards – How Riparian planting and stock exclusions shall apply</p>	<p>4.3.5.4 Permitted Activity – Livestock allowed in the Beds and Banks of Rivers and Lakes</p> <p>4.3.5.5 Discretionary Activity – Livestock on the Beds and Banks of Priority One Water Bodies</p> <p>4.3.5.6 Non-Complying Activity – Livestock on the Beds and Banks of Rivers and Lakes</p> <p>3.3.4.19 Controlled Activity Rule – Taking of Surface Water for Existing Milk Cooling and Dairy Shed Washdown</p> <p>3.3.4.28 – Standards – How riparian planting and stock exclusion shall apply</p>	<p>RIVER AND LAKE BED DISTURBANCES</p> <p>Section 13(1) RMA presumes that activities <u>cannot</u> be carried out unless expressly permitted in regional Plan or obtain resource consent.</p> <p>Also permits the associated discharge of contaminants (Section 15 RMA)</p> <p>4.3.5.4 Livestock on the bed and banks of rivers and lakes except in the Livestock exclusion areas (mapped areas)</p> <p>Key conditions = in stream water quality standard and % change in clarity</p> <p>Permitted Activity conditions: comply with suspended solids discharge standard</p> <ul style="list-style-type: none"> • Not cause reduction in visual clarity • Any erosion caused as a result of breach of condition shall be remedied as soon as practicable • Minimise the amount of time livestock spend crossing water bodies by providing crossing sites • In grazing – minimised the amount of time livestock spend in the bed or on the banks of lakes and rivers <p>4.3.5.5 Discretionary Activity – Sensitive receiving waterbodies - mapped livestock exclusion areas Standards and terms similar to the PA rule</p> <p>4.3.5.6 Non-complying except as provided for by rules above</p> <p>Livestock entering or crossing and associated discharge of suspended solids</p>	<p>4.3.5.1 Environmental Education</p> <p>Use education to promote:</p> <ul style="list-style-type: none"> • excluding livestock from the beds and banks of rivers and lakes, • the advantages of fencing riparian areas • how to organise and facilitate ‘Care’ groups as a means to address local destabilisation of river and lake beds and banks, • the advantages of using bridges and culverts for livestock crossings in preference to allowing livestock to have unimpeded access to water bodies. <p>3.9.4.2 Environmental Education</p> <p>3.3 Use education to raise the awareness about appropriate land management practices and streamside management;</p> <ul style="list-style-type: none"> • the exclusion of livestock from the beds and banks of water bodies, • the fencing of streamside areas, <p>3.9.4.7 Livestock Access and</p> <p>5.1.4.9 Effects of Livestock Management</p> <p>If the adverse effects attributable to livestock having access to water bodies is not reduced significantly at the time of Plan review or by 2005, whichever is the sooner, then rules to excludes livestock from water bodies identified by Method 3.9.4.6 as being particularly sensitive to land use effects, will be promoted</p>	<p>Prohibited activity rule</p> <p>See write up in #3425559</p> <p>Prohibited Activity Rule: Unrestricted Stock Access to a River or Lake Bed</p> <p>By [date], it is a prohibited activity to allow dairy, beef meat cattle, domestic farmed deer, domestic farmed goats and horses unrestricted access to a river or lake bed.</p> <p>This rules applies to all land excluding [insert descriptor of cut-off/threshold] e.g. of Land Use Class e.g. class 6e or slope greater than 25 degrees</p> <p>In the context of this rule unrestricted access means the ability for stock to enter a river or lake bed without limitation, and includes moving through the bed of a river or lake without provision for regular stock crossing in place.</p> <p>Advisory notes: Practical means of compliance with Rule X.X.X include, but are not limited to:</p> <ul style="list-style-type: none"> g) The use of bridges or culverts h) Fencing of riparian areas i) The use of gates in conjunction with fencing j) Provisions of troughs for livestock watering in adjacent fenced pasture areas

⁴ At the moment, only included comments on the Sustainable Dairying Water Accord SDWA and the Beef and LambNZ Land Environment Plan 1. I have looked at but not included the “Good management Practice target Waikato’ publication developed by DairyNZ Version 2 4 June 2015. This is intended as a guiding document to good management practices and is being used in development of Sustainable Milk Plans.

Practice	General interpretation of the sorts of rules CSG has discussed	Is there an equivalent requirement or suggested good practice by an industry body? ⁴	Does the WRP generally require the technology or practice in the same way the CSG has asked for?	Current rule categories	Overview of key conditions that must be met for the current rules	Current non-regulatory	Possible Changes to rules to make them address farming activities more directly/in a clear and unambiguous way
						as part of the Plan review or by way of a Plan change	<p>k) Construction of crossings so as to be direct a route across the bed of the river or lake as practicable</p> <p>l) Construction of hard entry and exit points at livestock crossing sites. Refer to sections 4.2.8 Bridges, 4.2.9 Culverts and 4.2.11 Fords for rule requirements when constructing these structures,</p> <p>RMA definitions: Bed means – in relation to a river – the space of land which the waters of the river cover at its fullest flow without overtopping its banks and - in relation to a lake – the space of land which the water of the lake cover at its annual highest level without exceeding its margin</p> <p>Lake means a body of fresh water which is entirely or nearly surrounded by land</p> <p>River means a continually or intermittently flowing body of fresh water; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity power generation, and farm drainage canal)</p>
Effects of stock crossing waterways	<p>Rules that require some form of infrastructure to minimise effects of regular stock crossing</p> <p>e.g. require culverts or bridges installed for regular stock crossing</p>	<p>Dairy Not really SDWA 'minimise effect' handy hints nothing specific</p> <p>Drystock No</p>	<p>No, even though culverts required the conditions largely around avoiding flooding, bed instability and ensuring fish passage</p> <p>No – bridges. There are no rules to <u>require</u> that bridges are installed. They are managed via conditions to make sure a new</p>	<p>Current controls on the erection, reconstruction, placement, alternation or extension of culverts and bridges and fords.</p> <p><u>Culverts</u></p> <p>4.2.9.1 Permitted Activity Rule – Catchments Not Exceeding Five Hectares</p> <p>4.2.9.2 Permitted Activity Rule – Culverts for Catchments Not Exceeding 100 Hectares</p> <p>4.2.9.3 Controlled Activity Rule - Culverts for Catchment Areas Not Exceeding 500 Hectares.</p>	<p>RIVER AND LAKE BED STRUCTURES bridges, culverts and fords</p> <p>4.2.8.1 Permitted Activity - bridges – use erection, reconstruction, placement, alternation or extension of single span bridge not exceeding 10 m length, any associated disturbance of sediment, and deposition of construction material</p> <ul style="list-style-type: none"> • Bridge design so that annual exceedence probability 1 in 50 year of flood event shall not cause flooding on neighbours • Underside at least .5m higher than tops of banks, comply with suspended solids standard • Inform the council in writing 10 working days prior to commencing construction, 	<p>4.3.5.1 Environmental Education Use education to promote:</p> <ul style="list-style-type: none"> • excluding livestock from the beds and banks of rivers and lakes, • the advantages of fencing riparian areas • how to organise and facilitate 'Care' groups as a means to address local destabilisation of river and lake beds and banks, • the advantages of using bridges and culverts for livestock crossings in preference to allowing livestock to have unimpeded access to water 	Incorporated into stock exclusion rule

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			bridge doesn't cause environmental effects, only that time spent crossing is minimised by providing stock crossing in exclusion rule, with advisory note mentioning bridges	<p><u>Bridges</u> Rules to expressly allow a bridge</p> <p>4.2.8.1 Permitted Activity Rule – Bridges 4.2.8.2 Controlled Activity Rule - Bridges 4.2.8.3 Restricted Discretionary Activity Rule – Bridges</p> <p>Fords 4.2.11.1 Permitted Activity Rule - Fords 4.2.11.2 Restricted Discretionary Activity Rule – Fords</p>	<ul style="list-style-type: none"> Remedy any erosion caused Not do activities in significant geothermal feature <p>Advisory Notes: (for stock exclusion rule 4.3.5.4) – practical measure of compliance use of culverts and bridges, riparian fencing, gates provision of trough, construction of hard entry and exit points etc</p> <p>4.2.9.1 Permitted Activity culverts – <i>use erection, reconstruction, placement</i>, alternation or extension of culvert not exceeding five hectares upstream of the culvert, any associated disturbance of sediment, and deposition of construction material</p> <ul style="list-style-type: none"> Designed so that a 1 in 50 year flood event shall not cause flooding of neighbours. Culverts shall be designed to safely overtop. not cause, water depth upstream to exceed three metres, or water depth downstream by more than three metres Not in any permanently flowing water body or in the headwaters of Natural State water Class Maps The activity shall not disturb any archaeological site or waahi tapu. In the event of any waahi tapu being identified the activity shall cease. The construction works shall comply with the suspended solids discharge standards. Remedy any erosion as soon as practicable. No discharge shall be made outside of the natural catchment. Not where there is a Significant Geothermal Feature. 	bodies.	
Forestry operations	CSG forestry rep presentation PA rules which include land disturbance, discharges of sediment General conditions on prior notification, good practice, accidental	Yes NZ Environmental Code of Practice for Plantation Forestry NZ Forest Owners Assoc	Yes – but the way the WRP packages the controls on activities is different	Permitted activity rule 5.1.4.11 Discretionary activity rule 5.1.4.13, if cant comply with PA	ACCELERATED EROSION Permitted Activity rule - Harvesting under vegetation clearance definition, 5m setback for replanting See roading and tracking for earthworks provisions	3.9.4.1 Good Practice Waikato Regional Council will encourage the use of good practice in land use activities and practices that reduce non-point source discharges.	Keep the current rules in 5.1.4 and add in additional clauses to conditions in 5.1.5 which apply to Waikato Waipa catchments. These include requirements to prepared and provide harvest plan one month prior to harvesting (for technical comment by council staff) for plantation forestry. The details and requirement of the plan content the same as that in the proposed NES plantation forestry as in the NES. Part of the rule that they provide

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	discovery protocols and beyond boundary instability Specific conditions on earthworks, planting and harvesting						erosion/sediment control plan.
Dairy Effluent Feed pad Stand off pad		SDWA requires fit for purpose effluent systems to achieve 365 day compliance. Dairy NZ a farmers guide to managing effluent Warrant of Fitness program Accredited designers		3.5.5.1 Permitted Activity Rule – Discharge of Farm Animal Effluent onto Land 3.5.5.2 Permitted Activity Rule – Discharge of Feed Pad and Stand-Off Pad Effluent onto Land 3.5.5.4 Discretionary Activity Rule – Discharge of Effluent onto Land 3.5.5.5 Discretionary Activity Rule – Discharge of Treated Effluent to Water 3.5.5.6 Prohibited Activity Rule – Discharge of Untreated Animal Effluent	DISCHARGES Section 15 RMA presumes that activities <u>cannot</u> be carried out unless expressly permitted in regional Plan or obtain resource consent. 3.5.5.1 Permitted Activity - Discharge of Farm Animal Effluent onto Land <ul style="list-style-type: none"> No discharge of effluent to water shall occur from any effluent holding facilities. Storage facilities and associated facilities shall be installed. All effluent treatment or storage facilities (e.g. sumps or ponds) shall be sealed (permeability of the sealing layer shall not exceed 1x10⁻⁹ metres per second). The total effluent loading shall not exceed the limit as specified in Table 3-8, Effluent loading rate onto irrigated land shall not exceed 25 millimetres depth per application. Effluent shall not enter surface water. Any discharge of contaminants into air shall comply with permitted activity conditions in Section 6.1.8. Provide information to show how the requirements of conditions are being met, if requested by WRC. Discharges not occur within 20 metres of a Significant Geothermal Feature*. Application of fertiliser on land where in last 12 month animal effluent has been disposed must be in accordance with fertiliser application Rule 3.9.4.11. 3.5.5.2 Permitted Activity - Discharge of Feed Pad and Stand-Off Pad Effluent onto Land <ul style="list-style-type: none"> The pad shall be sealed, The permeability of the sealing layer shall not exceed 1x10⁻⁹ metres per second. There shall be no run-off or discharge of pad effluent into surface water. Materials used to absorb pad effluent or when 	3.5.4.1 Environmental Education* Waikato Regional Council will, through environmental education programmes: <ul style="list-style-type: none"> Raise awareness of the use of land treatment as an environmentally sound method of treating some waste streams where soils allow, and recycling the nutrients and water they contain, as an alternative to disposal to water. 3.5.4.2 Promotion Waikato Regional Council will encourage and promote industry research into effluent management practices, specifically: <ul style="list-style-type: none"> Land-based irrigation systems. Methods for improving effluent quality. New technologies for managing agricultural effluents. 	

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					<p>spread on land shall not exceed the limit specified .The pad shall be located at least 20 metres from surface water.</p> <ul style="list-style-type: none"> Any discharge of contaminants into air shall comply with permitted activity conditions in Section 6.1.8 (effects on air). Provide information to show how the requirements of this rule are being met, if requested by WRC. Discharges not occur within 20 metres of a Significant Geothermal Feature*. Application of fertiliser on land where in last 12 month animal effluent has been disposed - fertiliser application Rule 3.9.4.11 <p>3.5.5.4 Discretionary Activity – Discharge of Effluent onto Land 3.5.5.5 Discretionary Activity – Discharge of Treated Effluent to Water 3.5.5.6 Prohibited Activity – Discharge of Untreated Animal Effluent</p>		
Setbacks e.g. intensive grazing in winter / setback for other land uses	<p>Rules for all sectors that setback [activity] from water way</p> <p>Rule for setbacks from waterways for intensive grazing in winter</p>	Nothing specific in SDWA	<p>WRP</p> <p>2m setbacks are for cultivation</p> <p>10m setback for soil disturbance or vegetation clearance in Karst landscape</p> <p>nothing specific about grazing near water ways</p>	<p>5.1.4.12 Permitted Activity Rule – Soil Cultivation Adjacent to Water Bodies</p> <p>5.1.4.17 Discretionary Activity Rule – Soil Disturbance/Vegetation Clearance in Karst Landscapes</p>	<p>ACCELERATED EROSION</p> <p>Permitted Activity - Soil disturbance roading, tracking and vegetation clearance – can do this as long as not in high risk erosion areas or Karst landscape or Coramandel</p> <p>Permitted Activity - Vegetation clearance of plantation forestry permitted</p> <p>Replanting of plantation forestry - Permitted - provided not occur within – 5m on either side of water – excluding ephemeral stream</p> <p>10m on either side of water body in Coramandel peninsula stream</p> <p>5.1.4.12 Permitted Activity - Soil cultivation permitted (adjacent) close to water bodies – not less than 2 metres from bed or lake and as long as not breach concentration of suspended soils – not breach water classes standards for: (listed classes)</p>	<p>3.9.4.1 Good Practice Encourage the use of good practice in land use activities and practices that reduce non-point source discharges.</p> <p>3.9.4.6 Risk Based Investigations Carry out a risk-based analysis to identify riparian areas and water bodies which are particularly sensitive to land use effects such as sediment and faecal material entering water, and establish priority areas to encourage and implement good</p>	<p>Staff comments on these ideas so far:</p> <ul style="list-style-type: none"> There are already setbacks on the plan for soil cultivation (2m), forestry replanting (5m) Vegetation clearance and tracking and roading have setback requirements in a ‘high risk erosion area’ – 10m from a waterway These ‘setbacks’ are only that consent is required if activities are undertaken in these areas, they are not mandatory setbacks Staff need more technical information on if a setback of grazing animals from waterways would be an important action to achieve environmental outcomes. A rules requiring set back of winter cropping areas may not be needed if there are rules on farm plans or a property level nitrogen limit Setback, earthworks and forestry

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							<p>are all mixed together in the same set of rules, if you pull one out then would need to change all of them for Healthy Rivers?</p> <p>Include a decision tree or flow chart that outlines relationship between rules in section 5.1.5.</p> <p>Consider changing the definition of high risk erosion – change the slope from 25 degrees to 20 or 22 degrees.</p> <p>Based on technical advice - Tighten the rule on 5.1.4.17 Karst systems – high risk – the soils disturbances, distance greater than 10m.</p> <p>-----</p> <p>Additional feedback from CSG rep: All productive use of the land for forestry operations, farming or cultivation must be set back 5m from river or lake beds.</p> <p>This can be incorporated in a number of ways:</p> <ul style="list-style-type: none"> • Write a general rule which covers all land uses, or • Specify the same setback but in different rules for different sectors e.g. <ul style="list-style-type: none"> ○ In new prohibited activity stock exclusion rule ○ In a new clause for forestry, see below ○ Changing the existing setback for cultivation from 2m to 5m <p>Use current WRP definition for farming activities and new production forestry</p>
Rozing and tracking				5.1.4.14 Controlled Activity Rule – Soil Disturbance, Rozing and Tracking and Vegetation	ACCELERATED EROSION 5.1.4.14 Controlled activity --- Soil disturbance rozing and tracking and vegetation clearance, riparian		

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				Clearance, Riparian Vegetation Clearance in High Risk Erosion Areas 5.1.4.15 Discretionary Activity Rule – Soil Disturbance, Roding, Tracking, Vegetation Clearance, Riparian Vegetation Clearance in High Risk Erosion Areas	<p>vegetation clearance - high risk erosion</p> <p>Roding and tracking between 100 and 2,00 metres length Soil disturbances activities between 250 and 1,000 cubic metres etc Vegetation clearance within 5m of banks of water body. Roding and tracking with the installation of a bridge or culvert Some exclusions – including plantation forestry clearance where clearance is for constructing access are otherwise permitted</p> <p>5.1.4.15 Discretionary activity - Soil disturbance roding and tracking and vegetation clearance, riparian vegetation clearance - high risk erosion Definition - High risk erosion area</p> <p>Where pre-existing slope of greater than 25 degrees Coastal etc Adjacent to water bodies, where</p> <ul style="list-style-type: none"> the land slope is greater than 0-15 degrees within 10 meters of any lake wetlands or bed of river <p>the land slope is greater than 15 degrees with that distance from a lake wetlands or bed of river of from mean high water spring, first point slope reduces to 15 degrees or less or 100 meters (whichever is lesser).</p>		
Riparian Planting	Farm plans that included actions to undertake riparian planting		No, plan rules are about vegetation clearances and destruction (5.1.4.11, 5.1.4.14, 5.1.4.15, 5.2.5.5, 5.2.5.2 and 4.3.9.3) Except for 3.3.4.19 and 3.3.4.28 which require the preparation of a Riparian Management Plan which includes fencing and planting of riparian areas as part of the	3.3.4.19 Controlled Activity Rule – Taking of Surface Water for Existing Milk Cooling and Dairy Shed Wash Down	<p>WATER TAKES</p> <p>3.3.4.19 Controlled Activity Rule – Taking of Surface Water for Existing Milk Cooling and Dairy Shed Wash Down</p> <p>Except as provided for by Rule 3.3.4.13 any taking of surface water described in 1 or 2 below for the purposes of milk cooling or dairy shed wash down is a controlled activity: subject to the following standards and terms:</p> <ul style="list-style-type: none"> A Riparian Vegetation Management Plan which meets the requirements of Method 3.3.4.28 shall be provided for the property for which the water is taken and used on and that plan shall specify the location and length of any streams whose riparian margins are to be planted and the proposed timing of that planting. <p>3.3.4.28 Standard – How riparian planting and stock exclusion fencing shall apply</p>	<p>3.9.4.2 Environmental Education raise the awareness about appropriate land management practices and streamside management:</p> <ul style="list-style-type: none"> the positive effects of enhanced streamside management, the fencing of streamside areas, Appropriate plants for enhancing riparian areas and pest control techniques. <p>3.9.4.5 Streamside Enhancement Fund Waikato Regional Council will make available a fixed contestable fund, reviewed annually, to support and facilitate streamside management. Investigations will be undertaken to identify areas in the Region that are most at risk with respect to adverse</p>	

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			consent required for water takes for milk cooling and dairy shed wash down.			effects on water quality, or will benefit most from streamside enhancement. The results of this will be utilised when considering applications to the fund.	
Vegetation clearance setbacks			Vegetation clearance and tracking and roading have "setback" requirements in a 'high risk erosion area' – 10m from a waterway	5.1.4.14 Controlled Activity Rule – Soil Disturbance, Roding and Tracking and Vegetation Clearance, Riparian Vegetation Clearance in High Risk Erosion Areas 5.1.4.15 Discretionary Activity Rule – Soil Disturbance, Roding, Tracking, Vegetation Clearance, Riparian Vegetation Clearance in High Risk Erosion Areas 5.1.4.17 Discretionary Activity Rule – Soil Disturbance/Vegetation Clearance in Karst Landscapes	See Roding and Tracking ACCELERATED EROSION Discretionary Activity for Karst Landscape any soil disturbance or vegetation clearance activity of, or 10 metres of, whichever is the lesser, a sinkhole or cave entrance the creation of a new entrance to a cave or soil disturbance within a cave; and any associated deposition of slash into or onto the beds of rivers and any subsequent discharge of contaminants into water or air		See comments about setbacks above
Cultivation					See Roding and tracking in this table See setbacks section in table		
Fertiliser Olsen P				3.9.4.11 Permitted Activity Rule – Fertiliser Application	NON-POINT SOURCE DISCHARGES 3.9.4.11 Permitted Activity Rule – Fertiliser Application The discharge of fertiliser into air and onto or into land outside the Lake Taupo Catchment is a permitted activity subject to the following conditions: a) The discharge shall not result in any objectionable odour or particulate matter beyond the property boundary. b) The discharge does not result in any avoidable direct application of fertiliser to any water body. c) Fertiliser must be applied in accordance with the NZ Fertiliser Manufacturers Research Association, 1998 (updated 2002): Code of Practice for Fertiliser Use. d) A nutrient management plan of the type specified in Table 3-10 (Table 3-10 Nutrient Management Requirements by Land Use Type) must be used to plan fertiliser application where nitrogen fertiliser is being applied at rates greater than 60 kg/N/ha/year. e) The contents of the nutrient management plan required by condition d) must be made available to the Waikato Regional Council upon request.	3.9.4.2 Environmental Education raise the awareness about appropriate land management practices and streamside management: • methods of fertiliser use and application that minimise adverse effects on water quality and aquatic ecosystems, 3.9.4.8 Nutrient Research Undertake and where appropriate encourage investigation into: • the adverse effects of fertiliser use and nutrients on water bodies • farm management techniques that make the most efficient use of nutrients inputs while minimising leaching • methods to prevent nutrient contamination of water bodies.	

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					f) A nutrient management plan shall be provided to Waikato Regional Council on request in accordance with condition d) where fertiliser is to be applied to an area of land that has also had farm animal effluent applied to it within the preceding 12 months.		
Overburden	Land contouring			<p>Land contouring</p> <p>For land contouring where overburden is reused are covered under the rules in 5.1.4</p> <p>Overburden rules (do not apply to soil disturbance activities where overburden is reused)</p> <p>5.2.5.1 Permitted Activity Rule – Overburden Disposal Outside of High Risk Locations</p> <p>5.2.5.2 Controlled Activity Rule – Overburden Disposal Not Permitted by Rule 5.2.5.1</p> <p>5.2.5.3 Discretionary Activity Rule – Large Scale Overburden Disposal</p> <p>5.2.5.4 Permitted Activity Rule – Small Scale Cleanfill Disposal Outside of High Risk Locations</p> <p>5.2.5.5 Controlled Activity Rule – Large Scale Cleanfill Disposal outside High Risk Locations</p> <p>5.2.5.6 Discretionary Activity Rule – Cleanfill Disposal in High Risk Locations</p> <p>Definition - Overburden: Clay, soil and rock associated with quarries, mining, earthworks, road construction and maintenance. Definition Cleanfill: Material that when discharge to the environment will have no adverse effect on people or the environment. This includes natural materials such as clay, soil and rock and other inert materials such as concrete and brick, or mixtures of any of the above.</p>	<p>DISCHARGES ONTO OR INTO LAND</p> <p>5.2.5.1 Permitted Activity Rule – Overburden Disposal Outside of High Risk Locations</p> <p>5.2.5.2 Controlled Activity Rule – Overburden Disposal Not Permitted by Rule 5.2.5.1</p> <p>5.2.5.3 Discretionary Activity Rule – Large Scale Overburden Disposal</p> <p>The discharge of overburden onto or into land and any subsequent discharge of contaminants into water or air.</p> <p>5.2.5.4 Permitted Activity Rule – Small Scale Cleanfill Disposal Outside of High Risk Locations</p> <p>The discharge of cleanfill onto or into land and any subsequent discharge of contaminants into water or air when occurring outside of:</p> <ul style="list-style-type: none"> A high risk erosion area, floodplain of a river, The catchment of, or within 10 metres of, whichever is the lesser, a sink hole* or cave entrance, Any wetlands¹⁰ that are areas of significant indigenous vegetation and/or significant habitats of indigenous fauna, A significant geothermal feature* <p>and where the total volume of cleanfill does not exceed 2,500 cubic metres per annum, is a permitted activity subject to conditions.</p> <p>5.2.5.5 Controlled Activity Rule – Large Scale Cleanfill Disposal outside High Risk Locations</p> <p>The discharge of cleanfill onto or into land and any subsequent discharge of contaminants into water or air that does not comply with Rule 5.2.5.4 is a controlled activity (requiring resource consent)</p> <p>5.2.5.6 Discretionary Activity Rule – Cleanfill Disposal in High Risk Locations</p> <p>The discharge of cleanfill onto or into land and any subsequent discharge of contaminants into water or air in a manner that does not comply with Rules 5.2.5.4 and 5.2.5.5 is a discretionary activity (requiring resource consent).</p>	<p>5.2.4.1 Good Practice</p> <p>Waikato Regional Council will, in conjunction with other organisations, industry groups and individuals, provide guidance on the development, implementation and review of good practices or appropriate codes of practice for:</p> <ul style="list-style-type: none"> cleanfilling and overburden disposal, addressing issues such as filling techniques, site selection, sediment control, waste acceptance criteria, rehabilitation, site stability/drainage and the protection/reuse of topsoil material 	

Practice	General interpretation of the sorts of rules CSG has discussed	Is there an equivalent requirement or suggested good practice by an industry body? ⁴	Does the WRP generally require the technology or practice in the same way the CSG has asked for?	Current rule categories	Overview of key conditions that must be met for the current rules	Current non-regulatory	Possible Changes to rules to make them address farming activities more directly/in a clear and unambiguous way
Offal holes	N/A – not raised by CSG		N/A	<p>5.2.6.2 Permitted Activity Rule – Offal Holes on Production Land</p> <p>5.2.6.3 Controlled Activity Rule – Offal Holes in Area of Shallow Ground Water</p> <p>5.2.6.4 Discretionary Activity Rule – Other Dumps and Offal Holes on Production Land</p>	<p>DISCHARGES ONTO OR INTO LAND</p> <p>5.2.6.2 Permitted Activity Rule – Offal Holes on Production Land</p> <p>The discharge of contaminants into or onto land from operating an offal hole does not comply with Rule 5.2.6.1 when occurring outside of: The catchment of, or within 10 metres of, whichever is the lesser, a sink hole* or cave entrance, A floodplain of a river, Any wetlands that are areas of significant indigenous vegetation and/or significant habitats of indigenous fauna , A significant geothermal feature</p> <p>is a permitted activity subject to the following conditions:</p> <ul style="list-style-type: none"> • Only dead animal matter and perishable household waste • The waste shall not contain: hazardous substances or contaminated material or sewage. • The lowest point of the offal hole shall be at least one metre above the level of the seasonally shallowest water table. • covered to prevent surface water and pests from entering. • not disturb any archaeological site or waahi tapu. • There are no objectionable effects as a result of odour beyond the property boundary. • The offal hole shall not be within 100 metres of any water supply bore or water body. <p>5.2.6.3 Controlled Activity Rule – Offal Holes in Area of Shallow Ground Water</p> <p>Except as authorised by Rule 5.2.6.2, the discharge of contaminants into or onto land as part of the operation of an offal hole is a controlled activity (requiring resource consent) subject to the following standards and terms:</p> <ul style="list-style-type: none"> • Only dead animal matter and perishable household waste shall be disposed of into the offal hole. • The waste shall not contain; hazardous substances or contaminated material or sewage. • Covered to prevent surface water and pests from entering. • Not affect a significant geothermal feature. • There are no objectionable odour beyond the property boundary. <p>5.2.6.4 Discretionary Activity Rule – Other Dumps and</p>	<p>5.2.4.1 Good Practice</p> <p>Waikato Regional Council will, in conjunction with other organisations, industry groups and individuals, provide guidance on the development, implementation and review of good practices or appropriate codes of practice for:</p> <ul style="list-style-type: none"> • dumps and offal holes on production land, addressing issues such as location, allowable rubbish types and management of the site after it has closed 	

Practice	General interpretation of the sorts of rules CSG has discussed	Is there an equivalent requirement or suggested good practice by an industry body? ⁴	Does the WRP generally require the technology or practice in the same way the CSG has asked for?	Current rule categories	Overview of key conditions that must be met for the current rules	Current non-regulatory	Possible Changes to rules to make them address farming activities more directly/in a clear and unambiguous way
					<p>Offal Holes on Production Land</p> <p>The discharge of any liquid or solid waste into or onto land and any subsequent discharge of contaminants to water or air during the operation of a dump or offal hole on production land where:</p> <ul style="list-style-type: none"> the contaminants are sourced only from the property on which the dump or offal hole occurs the activity does not comply with Rules 5.2.6.1, 5.2.6.2 and 5.2.6.3 the activity is addressed by Rules 7.2.6.1 and 7.2.6.2; <p>is a discretionary activity (requiring resource consent).</p>		
Property Drains	Discharges from one drain to another property drain			<p>3.5.4.4 Permitted Activity Rule – Discharges of Water to Water – General Rule</p> <p>3.5.4.5 Discretionary Activity Rule – Discharges – General Rule</p> <p>3.5.4.6 Non-Complying Activity Rule – Discharges into other Water Bodies</p> <p>3.5.10.1 Permitted Activity Rule – Take, Diversion and Discharge of Water Pumped from Drainage and Flood Control Schemes</p> <p>3.5.10.2 Controlled Activity Rule – Take, Diversion and Discharge of Water Pumped from Existing Drainage and Flood Control Schemes</p> <p>3.5.10.3 Discretionary Activity Rule – Discharge of Pumped Drainage Water</p>	<p>DISCHARGES</p> <p>3.5.4.4 Permitted Activity Rule – Discharges of Water to Water – General Rule</p> <p>Except as expressly provided for by other rules in this Plan any discharge of water (excluding geothermal water), into water is a permitted activity subject to the following conditions:</p> <ul style="list-style-type: none"> No adverse effect on water quality of the receiving water body. Any adverse erosion effects occurring as a result of the discharge to be remedied as soon as practicable. No adverse effects from increased water levels downstream of the discharge point. WRC shall be notified in writing of the discharge, its volume, contaminant concentrations and the water quality of the receiving water body 10 working days prior to the discharge commencing. <p>3.5.4.5 Discretionary Activity Rule – Discharges – General Rule</p> <p>Any discharge of a contaminant into water, or onto or into land, in circumstances which may result in that contaminant entering water, that is not specifically provided for by any rule, or does not meet the conditions of a permitted or a controlled activity rule in this Plan, is a discretionary activity (requiring resource consent).</p> <p>3.5.4.6 Non-Complying Activity Rule – Discharges into other Water Bodies</p> <p>The discharge of contaminants (not including stormwater or contaminants associated with the take and use of geothermal water), into Natural State Water Bodies or wetlands that are areas of significant indigenous vegetation and/or significant habitats of indigenous</p>		

Practice	General interpretation of the sorts of rules CSG has discussed	Is there an equivalent requirement or suggested good practice by an industry body? ⁴	Does the WRP generally require the technology or practice in the same way the CSG has asked for?	Current rule categories	Overview of key conditions that must be met for the current rules	Current non-regulatory	Possible Changes to rules to make them address farming activities more directly/in a clear and unambiguous way
					<p>fauna or cave entrances or lakes (excluding artificial lakes and Lake Rotoaira) is a non-complying activity (requiring resource consent).</p> <p>3.5.10.1 Permitted Activity Rule – Take, Diversion and Discharge of Water Pumped from Drainage and Flood Control Schemes</p> <p>The take, diversion and discharge of pumped water to water from drainage districts and river control schemes lawfully established or authorised before the date of notification of this Plan (28 September 1998)</p> <p>Conditions:</p> <ul style="list-style-type: none"> • remedied erosion as soon as practicable. • not exacerbate the effects of flooding on properties downstream. • not result in the lowering of water levels in any wetlands that are areas of significant indigenous vegetation and/or significant habitats of indigenous fauna. • not cause dissolved oxygen to fall below 80 percent of saturation concentration.. • comply with the suspended solids standards • not disturb any archaeological site or waahi tapu <p>3.5.10.2 Controlled Activity Rule – Take, Diversion and Discharge of Water Pumped from Existing Drainage and Flood Control Schemes</p> <p>The take, diversion and discharge of pumped drainage and floodwater to water from drainage districts and river control schemes lawfully established or authorised before the date of this plan (28 September 1998) that does not comply with or is not permitted by Rule 3.5.10.1 is a controlled activity (requiring resource consent). Waikato Regional Council reserves control over the following matters:</p> <ul style="list-style-type: none"> • Measures to prevent erosion or scour at the point of the discharge • Measures to prevent flooding effects on properties downstream. • Measures to prevent adverse effects on any wetland that is an area of significant indigenous vegetation or habitat of significant indigenous fauna. • Measures to ensure the discharge does not adversely affect the receiving water body in a manner which is inconsistent with the relevant Water Management Classes <p>3.5.10.3 Discretionary Activity Rule – Discharge of Pumped Drainage Water</p>		

Practice	General interpretation of the sorts of rules CSG has discussed	Is there an equivalent requirement or suggested good practice by an industry body? ⁴	Does the WRP generally require the technology or practice in the same way the CSG has asked for?	Current rule categories	Overview of key conditions that must be met for the current rules	Current non-regulatory	Possible Changes to rules to make them address farming activities more directly/in a clear and unambiguous way
					<p>The take, diversion and discharge of pumped drainage and floodwater to water that does not comply with, or is not permitted by Rule 3.5.10.1 or Rule 3.5.10.2 is a discretionary activity (requiring resource consent).</p> <p>There are also a series of rules around the discharge of stormwater to water.</p> <p>Definition of stormwater – Artificially channellised rainwater prior to its point of discharge to land or water</p> <p>3.5.11.4 Permitted Activity Rule – Discharge of Stormwater to Water</p> <p>3.5.11.5 Permitted Activity Rule – Discharge of Stormwater Onto or Into Land</p> <p>3.5.11.6 Controlled Activity Rule – Discharge of Stormwater Onto or Into Land</p> <p>3.5.11.7 Controlled Activity Rule – Discharge of Stormwater Into Water</p> <p>3.5.11.8 Discretionary Activity Rule – Discharge of Stormwater</p>		

Current Waikato Regional Plan rules, industry equivalents and options proposed by CSG

Table 7: Possible content of a tailored property plan

Practice	General interpretation of the sorts of rules CSG has discussed	Is there an equivalent requirement or suggested good practice by an industry body? ⁵	Does the WRP generally require the technology or practice in the same way the CSG has asked for?	Current rule categories	Key conditions that must be met for the current rules	Current non-regulatory	Possible Changes to rules to make them address farming activities more directly/in a clear and unambiguous way
Stabilising erosion risk areas	Rules to manage erosion risk areas	Dairy Yes, SDWA require farmers to identify risk areas, MGM has specific actions for the very high risk land Class VIII Drystock Yes LEP 1 looks at identifying risk areas HortNZ Yes, suggestions about practices to reduce risk of soil loss on sloping land	No – WRP is more about preventing erosion through controlling volumes of earthworks – less is allowed as a PA on the steepest land that is 25 degrees or steeper	Existing rules are about soil stability and trying to reduce the human-induced effects of erosion i.e. this is called ‘accelerated erosion’ 5.1.5 Conditions for Permitted Activity Rule 5.1.4.11 and Standards and Terms for Controlled Activity Rules 4.2.15 Erosion Control Structures 4.2.15.1 Permitted Activity Rule – Erosion Control Structures 4.2.15.2 Controlled Activity Rule – Erosion Control Structures 5.1.4.14 Controlled Activity Rule – Soil Disturbance, Roding and Tracking and Vegetation Clearance, Riparian Vegetation Clearance in High Risk Erosion Areas 5.1.4.15 Discretionary Activity Rule – Soil Disturbance, Roding, Tracking, Vegetation Clearance, Riparian Vegetation Clearance in High Risk Erosion Areas	ACCELERATED EROSION Controlled activity - Soil disturbance roading and tracking and vegetation clearance, riparian vegetation clearance - high risk erosion Roding and tracking between 100 and 2,00 ,metres length Soil disturbances activities between 250 and 1,000 cubic metres etc Vegetation clearance within 5m of banks of water body. Roding and tracking with the installation of a bridge or culvert Some exclusions – including plantation forestry clearance where clearance is for constructing access are otherwise permitted Discretionary activity - Soil disturbance roading and tracking and vegetation clearance, riparian vegetation clearance - high risk erosion Definition - High risk erosion area Where pre-existing slope of greater than 25 degrees Coastal clauses Adjacent to water bodies, where <ul style="list-style-type: none"> the land slope is greater than 0-15 degrees within 10 meters of any lake wetlands or bed of river the land slope is greater than 15 degrees with that distance from a lake wetlands or bed of river of form mean high water spring, first point slope reduces to 15 degrees or less or 100 meters (whichever is lesser). 	Education about avoiding, remedying or mitigating the adverse effects of land use (Method 5.1.4.1). 5.1.4.3 – provide guidance on good practice techniques or appropriate codes of practice	Incorporated into farm plan
Trapping sediment	Rules to manage actively eroding sediment sources, particularly rules to make sure people trap sediment before it gets to stream bank and then into waterway	Dairy & drystock Nothing specific HortNZ Yes, good practice suggestions for sediment detention areas, soaking water/soil in the paddock via ripping the wheel tracks	WRP nothing specific - rules are more about managing activities that disturb stream banks, wetlands, hill slopes, rather than rehabilitating or creating swales and sediment traps	5.1.5 Conditions for Permitted Activity Rule 5.1.4.11 and Standards and Terms for Controlled Activity Rules	ACCELERATED EROSION 5.1.5 Permitted activity rule conditions for Soil disturbance roading, tracking and vegetation clearance Conditions <ul style="list-style-type: none"> Controls during earthworks, cut-offs and culverts Not causing flooding on neighbours property Disturb vegetation, soils, debris – diversion and damming river, passage of fish impede, destruction of habitat Concentration of suspended soils not exceed standard Felling vegetation – diversion of tree fall away from water, Stabilise soils resulting from the activity Cover exposed soils as result of activity within 6-13 months 		Incorporated into farm plan

⁵ At the moment, only included comments on the Sustainable Dairying Water Accord SDWA and the Beef and LambNZ Land Environment Plan 1. I have looked at but not included the “Good management Practice target Waikato’ publication developed by DairyNZ Version 2 4 June 2015. This is intended as a guiding document to good management practices and is being used in development of Sustainable Milk Plans.

Practice	General interpretation of the sorts of rules CSG has discussed	Is there an equivalent requirement or suggested good practice by an industry body? ⁵	Does the WRP generally require the technology or practice in the same way the CSG has asked for?	Current rule categories	Key conditions that must be met for the current rules	Current non-regulatory	Possible Changes to rules to make them address farming activities more directly/in a clear and unambiguous way
					<ul style="list-style-type: none"> Concentration of suspended soils – not breach water classes standards for: (listed classes different standards) <p>Soil disturbance associated with construction road, track within 20m of a culvert or bridge – not occur near fisheries water classes during August to December etc. Stabilise against erosion no later than 2 month from completion Notify WRCs location of disturbance in writing.</p>		
Tailored property plans	Permitted activity if farm plan is submitted to councils, if no farm plan submitted then falls into discretionary activity	Sustainable Milk Plans, Land Environment Plans	<p>No – rules that require a farm plan, closest thing is to provide a nutrient budget on request or requirement to prepare Riparian Management Plan as part of water take consent.</p> <p>Yes voluntary for Funding as part of the Waipa catchment plan.</p> <p>ICM project had farm plans</p>	3.9.4.11 Permitted Activity Rule – Fertiliser Application	<p>NON- POINT SOURCE DISCHARGES</p> <p>3.9.4.11 Permitted Activity Rule – Fertiliser Application The discharge of fertiliser* into air and onto or into land outside the Lake Taupo Catchment is a permitted activity subject to the following conditions:</p> <p>Fertiliser must be applied in accordance with the NZ Fertiliser Manufacturers Research Association, 1998 (updated 2002): Code of Practice for Fertiliser Use. A NMP must be used to plan fertiliser application where nitrogen fertiliser is being applied at rates greater than 60 kg/N/ha/year. The contents of the nutrient management plan must be made available to the Waikato Regional Council upon request. A NMP shall be provided to Waikato Regional Council on request - where fertiliser is to be applied to an area of land that has also had farm animal effluent applied to it within the preceding 12 months.</p> <p>WATER TAKES</p> <p>3.3.4.28 Standard – How riparian planting and stock exclusion fencing shall apply These need to include the extent of riparian fencing and planting, timeframes for implementation of fencing and/or planting.</p>	<p>5.1.4.5 WRC will encourage and assist landowners with the development and implementation of property management plans and environmental management systems – identify erosion risk areas and measure to avoid/remedy or mitigate adverse effects of land use activities.</p> <p>3.9.4.2 Environmental Education* Waikato Regional Council will, through environmental education programmes, raise the awareness within the community about appropriate land management practices and streamside management.</p> <p>In particular, regarding: the positive effects of enhanced streamside management, the exclusion of livestock from the beds and banks of water bodies, the fencing of streamside areas, the effects of land use on ground water quality and the promotion of well head protection, methods of fertiliser use and application, appropriate plants for enhancing riparian areas and pest control techniques for animal and plant pests.</p>	
Setbacks e.g. intensive grazing in winter / setback for other land uses	Rules for all sectors that setback [activity] from water way Rule for	Nothing specific in SDWA	<p>WRP</p> <p>2m setbacks are for cultivation</p> <p>5m replanting setback for forestry</p>	<p>5.1.4.11 Permitted Activity Rule – Soil Disturbance, Roding and Tracking and Vegetation Clearance</p> <p>5.1.4.12 Permitted Activity Rule – Soil Cultivation Adjacent to</p>	<p>ACCELERATED EROSION</p> <p>5.1.4.11 Permitted Activity - Soil disturbance roading, tracking and vegetation clearance – can do these activities as long as not in high risk erosion areas or Karst landscape or Coramandel</p> <p>Permitted Activity - Vegetation clearance of plantation forestry permitted</p>	3.9.4.1 Good Practice Waikato Regional Council will encourage the use of good practice in land use activities and practices that reduce non-point source discharges.	<p>Staff comments on these ideas so far:</p> <ul style="list-style-type: none"> There are already setbacks on the plan for soil cultivation (2m), forestry replanting (5m)

Practice	General interpretation of the sorts of rules CSG has discussed	Is there an equivalent requirement or suggested good practice by an industry body? ⁵	Does the WRP generally require the technology or practice in the same way the CSG has asked for?	Current rule categories	Key conditions that must be met for the current rules	Current non-regulatory	Possible Changes to rules to make them address farming activities more directly/in a clear and unambiguous way
	setbacks from waterways for intensive grazing in winter		nothing specific about grazing near water ways	Water Bodies 5.1.4.17 Discretionary Activity Rule – Soil Disturbance/ Vegetation Clearance in Karst Landscapes	Replanting of plantation forestry - Permitted - provided not occur within – 5m on either side of water – excluding ephemeral stream 10m on either side of water body in Coramandel peninsula stream 5.1.4.12 Permitted Activity - Soil cultivation permitted (adjacent) close to water bodies – not less than 2 metres from bed or lake and as long as not breach concentration of suspended soils – not breach water classes standards for: (listed classes)		<ul style="list-style-type: none"> Vegetation clearance and tracking and roading have setback requirements in a ‘high risk erosion area’ – 10m from a waterway These ‘setbacks’ are only that consent is required if activities are undertaken in these areas, they are not mandatory setbacks Staff need more technical information on if a setback of grazing animals from waterways would be an important action to achieve environmental outcomes. A rules requiring set back of winter cropping areas may not be needed if there are rules on farm plans or a property level nitrogen limit Setback, earthworks and forestry are all mixed together in the same set of rules, if you pull one out then would need to change all of them for Healthy Rivers? <p>Include a decision tree or flow chart that outlines relationship between rules in section 5.1.5.</p> <p>Consider changing the definition of high risk</p>

Practice	General interpretation of the sorts of rules CSG has discussed	Is there an equivalent requirement or suggested good practice by an industry body? ⁵	Does the WRP generally require the technology or practice in the same way the CSG has asked for?	Current rule categories	Key conditions that must be met for the current rules	Current non-regulatory	Possible Changes to rules to make them address farming activities more directly/in a clear and unambiguous way
							erosion – change the slope from 25 degrees to 20 or 22 degrees. Based on technical advice - Tighten the rule on 5.1.4.17 Karst systems – high risk – the soils disturbances, distance greater than 10m.
Stock exclusion from waterways				See deer and cattle in water in catchment wide rules table			
Cultivation				See roading and tracking in this table			
Nutrient budgeting Nutrient Management Plans	Nutrient management		NMP required if application of fertiliser greater than 60 kg/N/ha/year. See N Limit - Taupo section in tables above that requires a NMP	3.9.4.11 Permitted Activity Rule – Fertiliser Application	3.9.4.11 Permitted Activity Rule – Fertiliser Application The discharge of fertiliser into air and onto or into land outside the Lake Taupo Catchment is a permitted activity subject to the following conditions: <ul style="list-style-type: none"> A nutrient management plan of the type specified in Table 3-10 must be used to plan fertiliser application where nitrogen fertiliser is being applied at rates greater than 60 kg/N/ha/year. 		
Land Use Capability*	Manage different parts of property to land use capability						
Winter cropping*	Rule that restricts location of winter crops relative to water ways Rules that stop in-situ fodder crop grazing in winter Rule that restricts stock of certain size grazing winter crops						
Limit stock on steep slopes/certain land use classes*	Rules to limit stock on steep/very steep land e.g. from carrying stock at a certain unit threshold/ size/type						
Soils erosion /harvest plans*	Require a soil erosion plan for cultivation and earthworks						