

# CNI Iwi Holdings Ltd

for

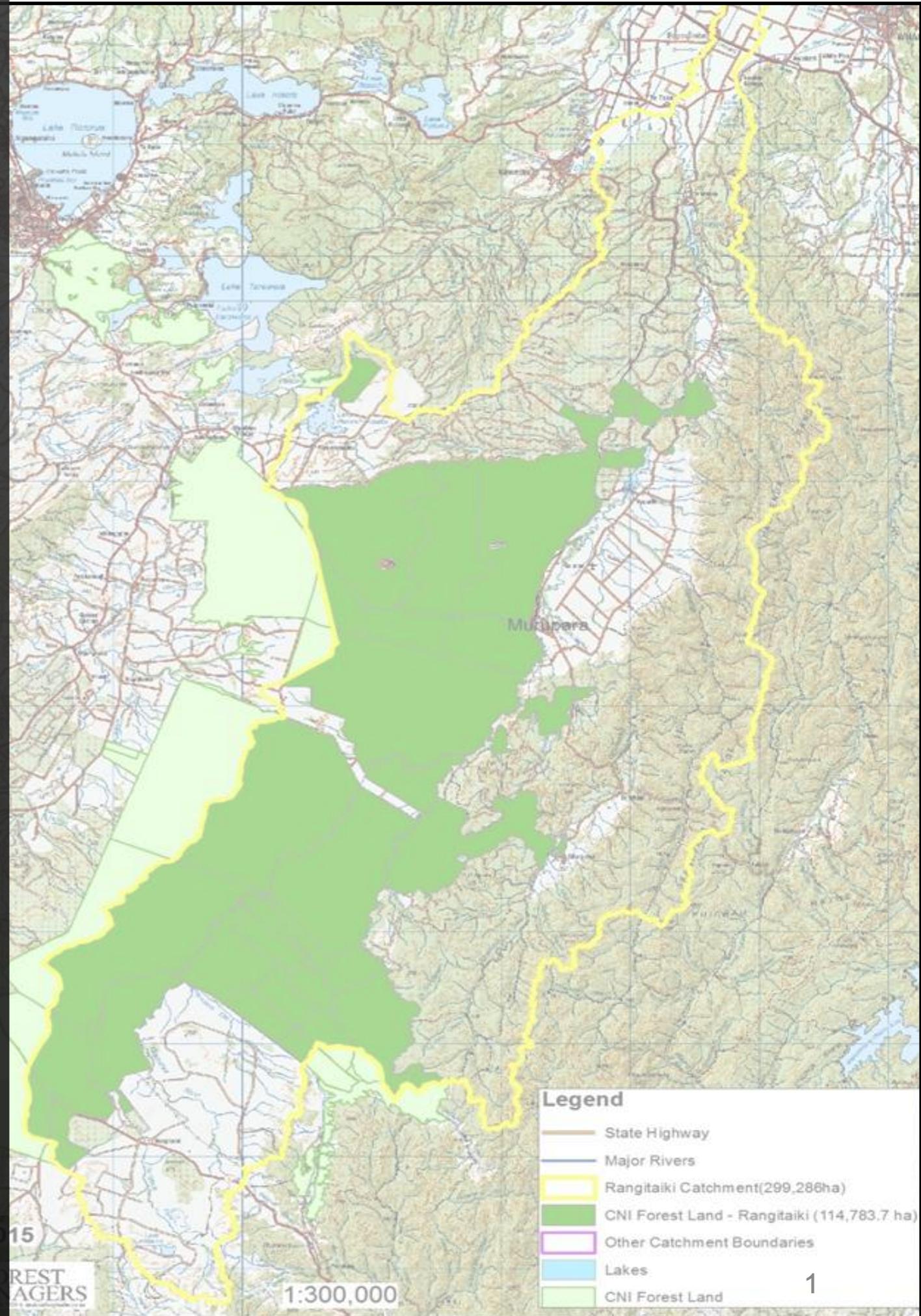
# the CNI Iwi Collective

Waikato Plan Change One  
Part 2 – PC1 parts C1 to C6

CNI Iwi Holdings Limited

Date: 03-08-2015

N.Z. FOREST MANAGERS



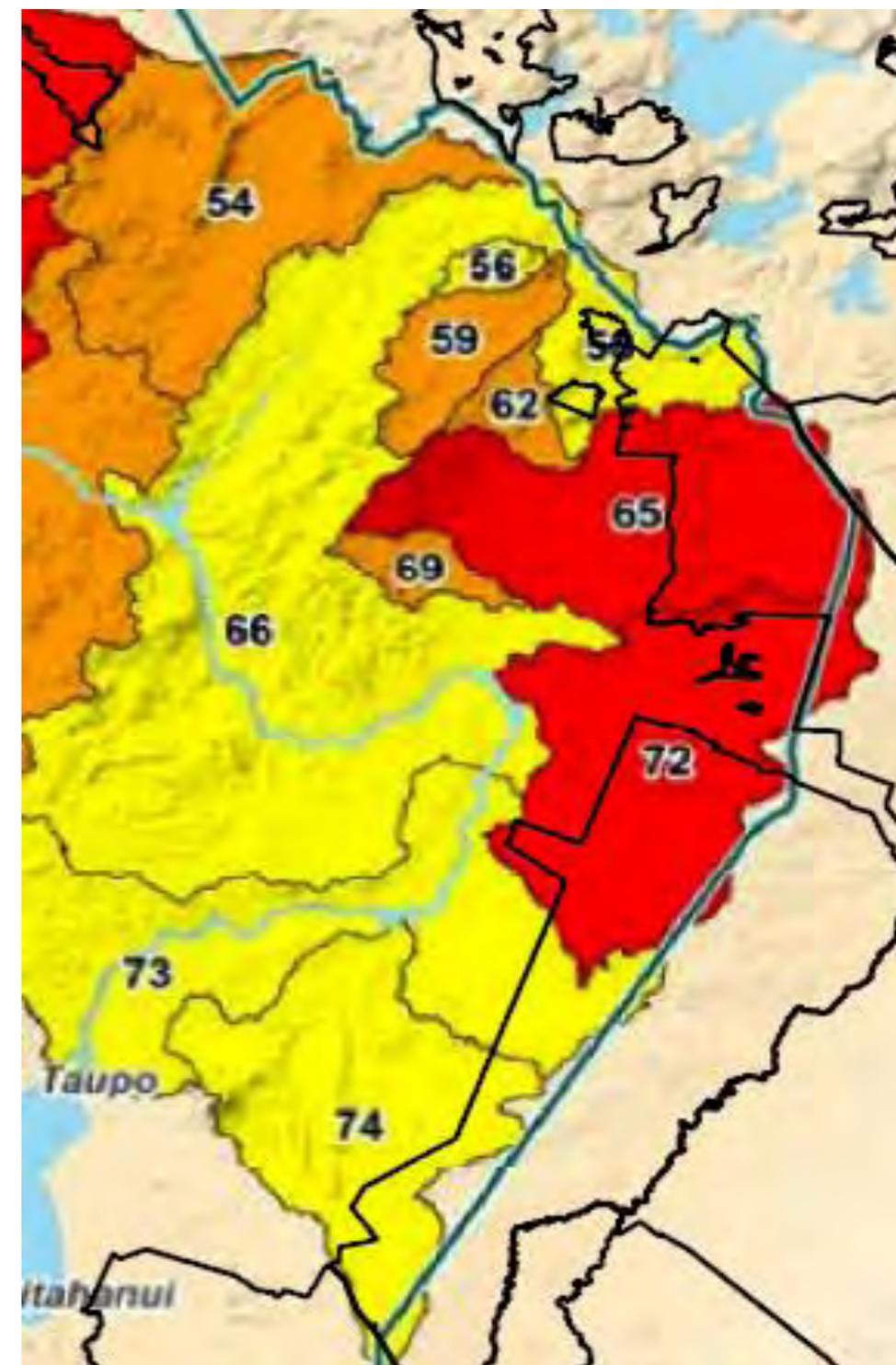
The most significant water quality deterioration at the largest number of sites is total nitrogen

**Legend**

- State Highway
- Major Rivers
- Rangitaiki Catchment(299,286ha)
- CNI Forest Land - Rangitaiki (114,783.7 ha)
- Other Catchment Boundaries
- Lakes
- CNI Forest Land

Date: 03-08-2015

CNI Iwi Holdings Limited  
MANAGERS  
1:300,000



# PC1 Plan architecture

## N leach

- Land use intensity, intent to have numeric allocation via Overseer Nitrogen Reference Point  
*no direct compliance check possible*

## Phosphorus, sediment, pathogens

- Practice improvement at Critical Source Areas via Farm Environment Plans  
*direct compliance check possible*
- *N from critical source areas is covered where?*

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*Overseer is meant for one-time relative use only*

It has no constant relationships over time or between properties or land uses

Farm A

≠

Farm B

Farm A  
Year 1

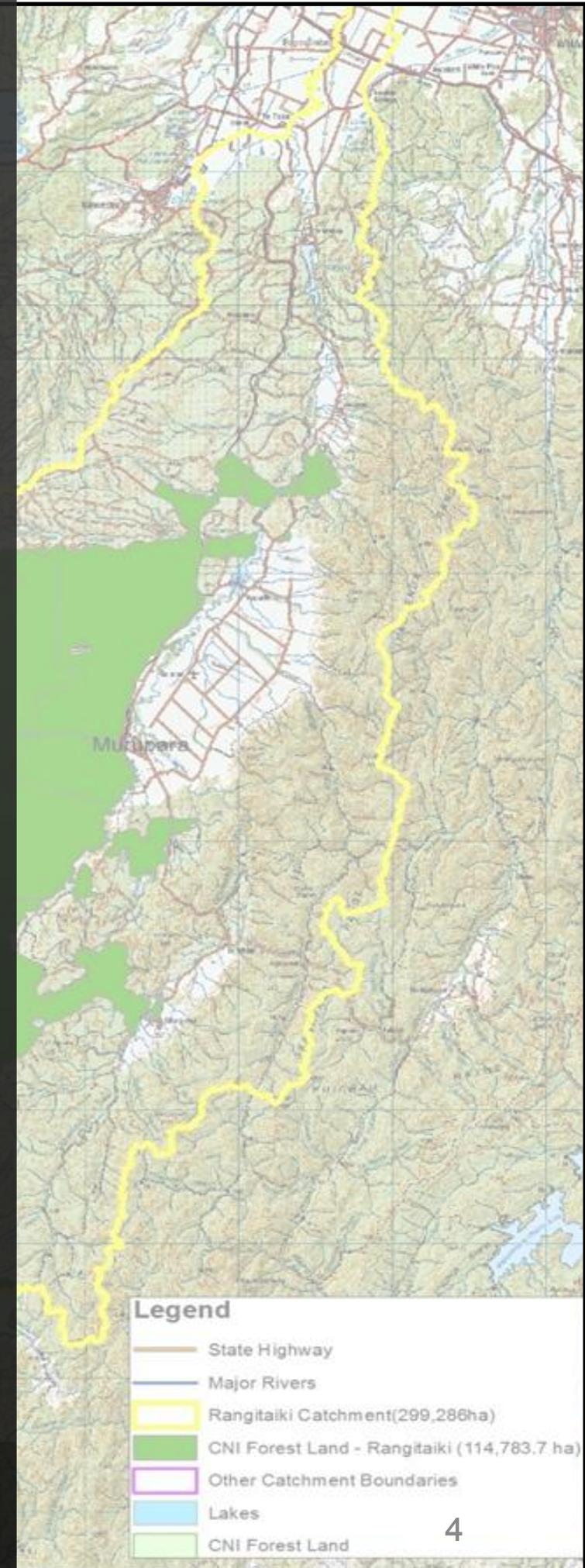
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Farm A  
Year 2

Land use A

≠

Land use B



The N leach policy tools need to identify:

- Trigger levels that will require behaviour change (sets rule & status)
- what behaviour change is required (rule content)
- What will be used as the trigger

## PC1 Plan architecture

N leach

- Use numeric allocation to derive trigger despite no suitable tools
- Or (simpler) stock intensity trigger

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Legend

- S
- M
- R
- CN
- Other
- Lakes
- CNI Forest Land

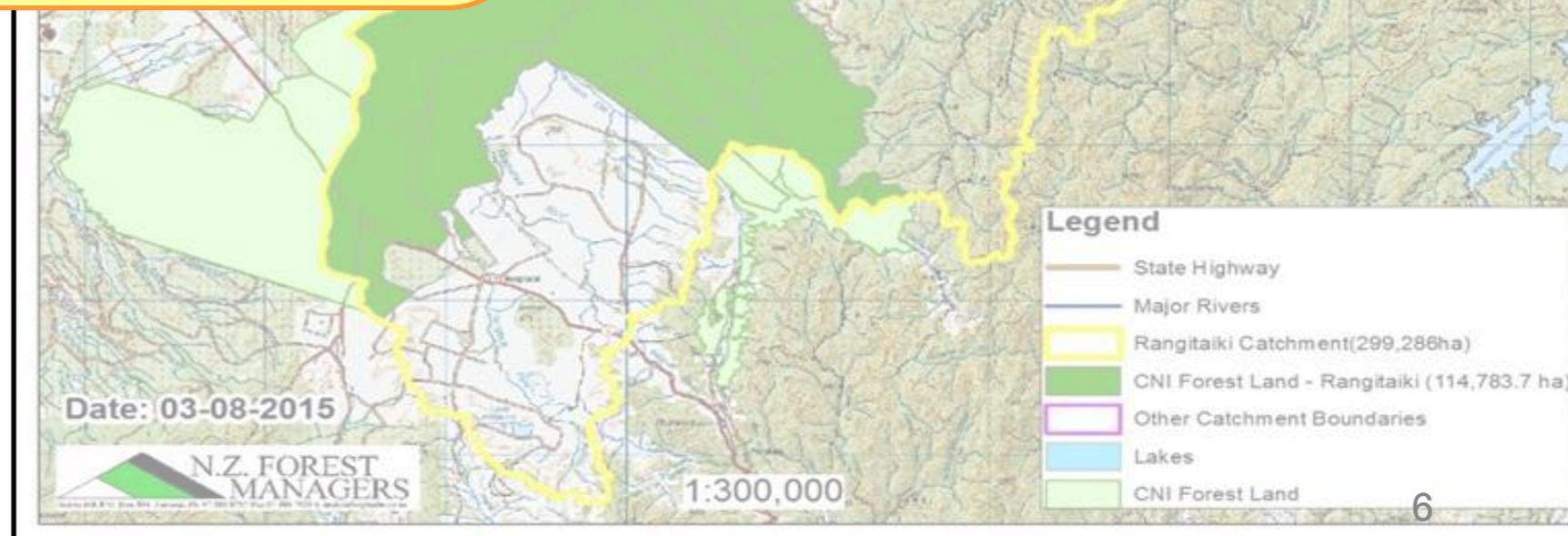
## On Farm Good Practice

- Immediate start
- Rule certainty, compliance straightforward
- Behaviour aligned with pollution reduction goal
- Performance is measureable
- Also addresses surface contamination (CSA)

## Allocation

- Delayed start while data gathered
- Uncertainty - Tools not competent
- Contentious
- Distraction from pollution reduction goal
- Huge data collection cost
- Unfair (rewards past poor practice)

Energy  
and effort  
to reduce N



# Critical source area management

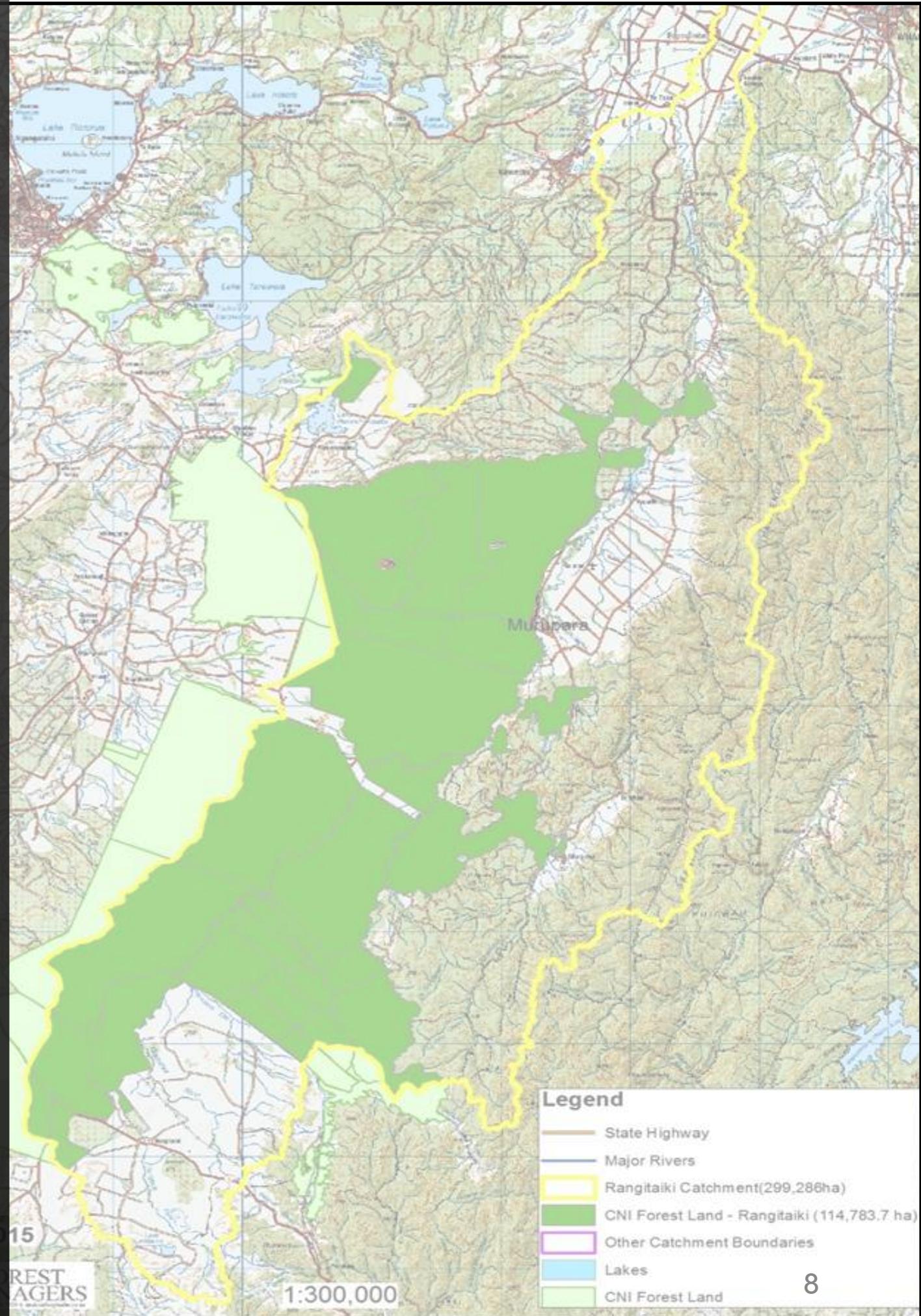


# Consequential changes to the Waikato Regional Plan

CNI Iwi Holdings Limited

Date: 03-08-2015

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# Consequential changes to existing Waikato plan are inappropriate



Don't remove  
Instead  
recraft or  
repeat in PC1



PC 1 Plan should include

Certain and consistent requirements for common practices

E.g. Farm Environment Plan and **Stored product**

- No discharge to any effluent holding facilities
- Storage and associated infrastructure to ensure no discharge
- All effluent treatment facilities (or ponds) are sealed.



**Friday, 29 June 2018, 12:22 pm**  
**Press Release: WRC**  
 Nineteen per cent of Waikato farms have “grossly undersized” effluent storage and Waikato regional councillors have backed a plan aimed at bringing them in line.

**Farm Environment Plan content should only be customised for site-specific matters.**

**All generic good practices should apply to all FEPs.**

CNI Iwi Holdings Limited



We've asked 432 of Waikato's high risk farms for plans to upgrade their storage, and in four years just 76 have done this.

## PC 1 Plan should include

Certain and consistent requirements for common problems

E.g. Farm Environment Plan Land Application

- Effluent discharge shall not exceed the limit in Table 3-8.
- Loading rate shall not exceed 25 mm depth per application.
- Effluent shall not enter water bodies via overland flow, or pond overflow surface for any application.
- Where effluent is applied to the same land on which farm animal effluent is disposed for more than 3 months, the application must be in accordance with Rule 3.9.4.11.

**Farm Environment Plan content should only be customised for site-specific matters.**

**All generic good practices should apply to all FEPs.**



# PC 1 Plan should include Certain and consistent requirements for common problems

## The discharge of effluent from feed pad or stand off pad:

- The pad shall be constructed to prevent the discharge of pad effluent into surface water.
- Material used to absorb pad effluent and the effluent itself spread over a means of disposal shall not exceed the limit specified in Table 1.
- Where effluent is applied on land on which farm animals are grazed or used of in the preceding 12 months, the application must be in accordance with Rule 9.9.11.

