



Omnibus Plan Change

July and August 2020

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FIRST OF ALL

Look after yourself and each other

RURAL SUPPORT TRUST

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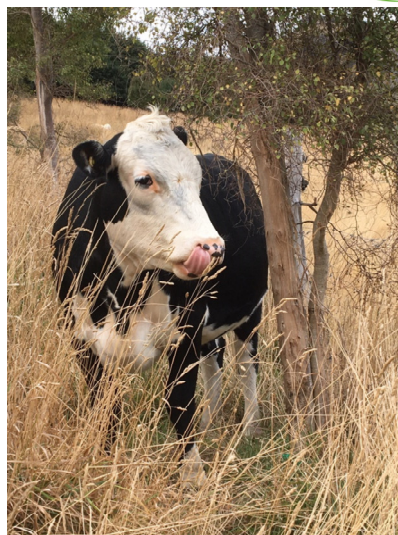


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The Line-Up

1. National Policy
2. How does it all fit together?
3. The Process
4. PC7
5. PC1
6. PC8
7. Submissions
8. Questions



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National Policy

A quick run through

Climate Change

- No opportunity to further influence current pages, likely will later
- B+LNZ asked for cap on ability to offset emissions (carbon farming). Govt says no, maybe in future.
- Work currently underway through He Waka Eke Noa.

Essential Freshwater Package

- With the ministers now.
- Will see the detail of the decisions before the elections.
- Every council will have to update their plans within three years and operative within 5.

National Policy Statement for Indigenous Biodiversity

- Supposed to land now
- Tipped to be made operative 100days+ after elections

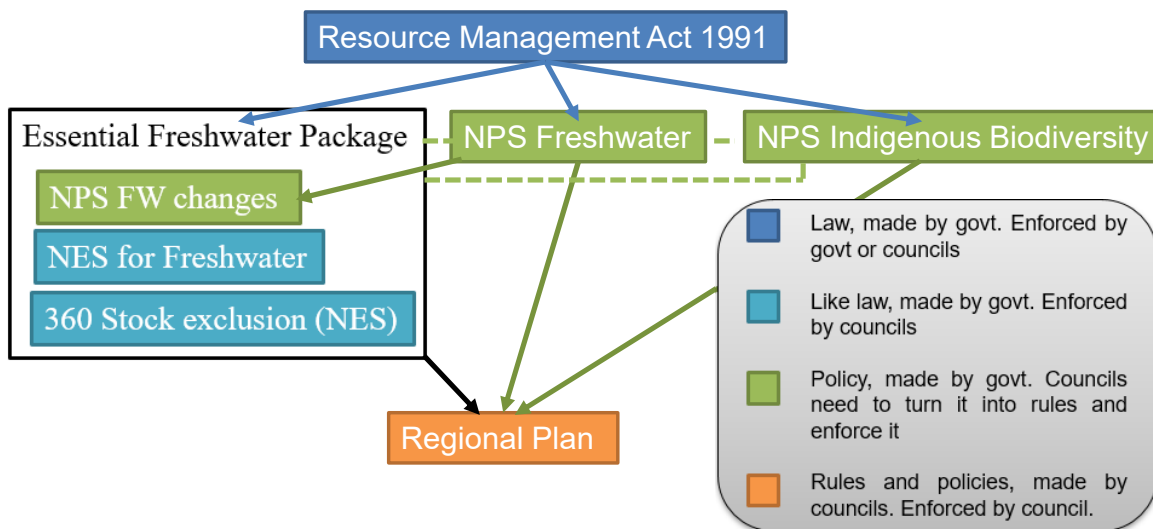


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How does it all fit together?

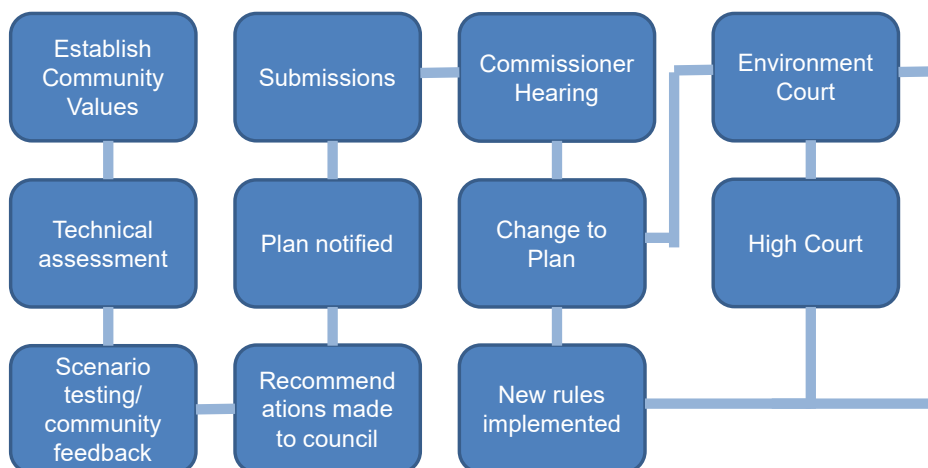
Like this...



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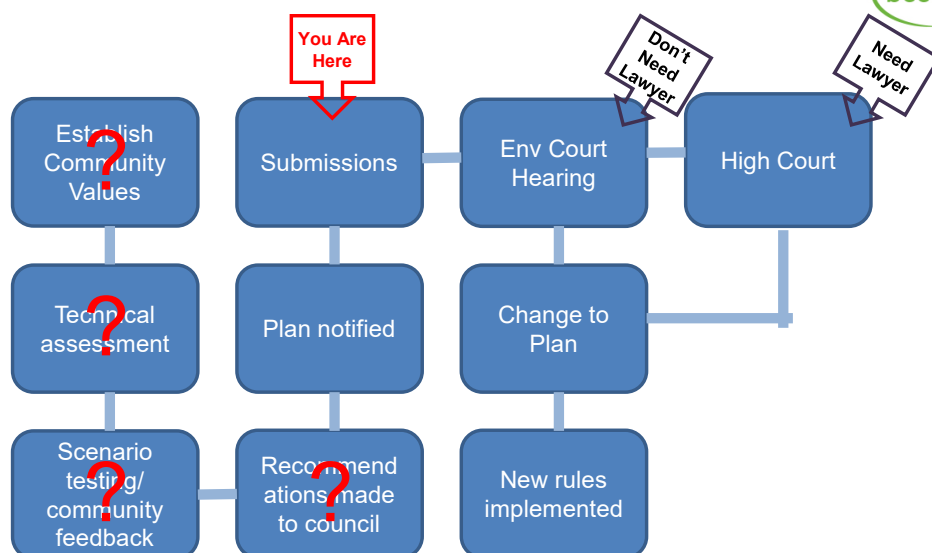
Normal Plan Change Process



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Omnibus PC + PC7 Process



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Plan Change 7

Deemed Permits

This plan change is supposed to be a band-aid to solve the problem of 2/3 of Otago's water permits expiring before ORC have a chance to review the Otago Regional Plan.

Don't want to issue new long term water permits when the new plan will likely set smaller allocations, higher minimum flows, and different cease take triggers.

PC7 proposes:

Controlled Activity consent duration up to 6 years

- X You could lose some of your water allocation
- X Consent conditions will require efficient water use
- X Locks down take + volume to your 12-17 average
- X It doesn't allow for development post 17/18
- X Effectively grandparents land use to 17/18
- X Opens the door to grandparenting nutrients for region generally

Otherwise it's a non-complying activity...

New submissions due by 5pm 17 August 2020

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PC7 was already notified earlier this year. If you already put in a submission you don't need to do anything. If you didn't put in a submission, now is your chance. To help you with this,

- April's presentation slides,
- The plan change document,
- The PC7 EPA submission template, and
- B+LNZ submission on PC7

Are all here: www.beeflambnz.com/news-views/otago---plan-change-7-and-omnibus-pc-1-and-8-plan-change (scroll down).

Plan Change 7 (Deemed Permits)

Plan Change 7 was initially notified by ORC earlier this year, and was accepting submissions until 4 May 2020.

The EPA has re-notified it and is inviting submissions from anyone who has not already made a submission on PC7 until **5pm on 17 August 2020**.

This means that if you **did not** make a submission on PC7, you now have an opportunity to do so.

If you **already** made a submission on PC7, you do not need to do anything. ORC will pass on your submission to the EPA. If you already made a submission on PC7, you cannot put in another one on PC7.

You must send BOTH the EPA and ORC a copy of your submission. Email or post your submission to:

EPA: Email: otago.plan.changes@epa.govt.nz Subject line: www.beeflambnz.com/news-views/otago---plan-change-7-and-omnibus-pc-1-and-8-plan-change	ORC: Email: otago@orc.govt.nz Subject line: www.beeflambnz.com/news-views/otago---plan-change-7-and-omnibus-pc-1-and-8-plan-change
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Plan Change 1



Part 6

Prevent waste oil from being used as a dust suppressant.

Part 7

Changes do not appear to apply to offal pits or farm landfills. BUT...
Keep GMP in mind...



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Plan Change 8



Part A: Discharge policies

Part B: Effluent storage and application

Part C: Good farming practices

Part D: Intensive Farming

Part E: Stock Exclusion

Part F: Sediment Traps

Won't address today, but
includes waste systems for
ALL ANIMALS (not just
dairy cows – e.g. feedpads,
feedlots, winter housing,
deer, beef, sheep dairy etc)

Part A is relevant to all of these because they are all ultimately
concerned with contaminant discharge to water.

Policies guide rules and fill the gaps where the rule isn't clear or there is no
rule, so don't ignore them.



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PC8: Part A Discharge policies



Policies under 7D

- Relate to 12C – farm N discharges
- When considering any 12C discharge, consent processor must consider any particular sensitivity of the land and any receiving water
 - Very broad, can include and land water with no or low ecological, connectivity, stock or drinking supply, and recreational value.



Ongoing reduction of adverse environmental effects of discharge

- There is no floor.
- Avoid potentially significant adverse effects.
 - Avoid doesn't mean try not to do that. Avoid means you may not do that (*King Salmon*)



7.D.6 allows for 10 year consent durations for discharges under Rule 12.C.3.2.

- PC7 (deemed permits) only allowed 6 year consent durations
- Grandparents N for high leachers past development of new regional plan.
- Less N in the bucket for everybody else when calculating N allocations in new plan.



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Wait, what is grandparenting?



A Canterbury Example...

Lisa's farm leaches an average of 7kgN/ha/yr

Bart's farm leaches an average of 60kgN/ha/yr

ECan decides to grandparent nutrients, and farmers need to reduce their N losses by 10% to meet the NPS FW targets.

Lisa and Bart cant make any changes to their farm (new crop, more stock, extra N following drought) that will increase their N number.

Lisa has no flexibility to change her system anymore, especially not irrigate or put in winter forage crops. She realises it's very hard for an already low leaching farm to further reduce N.

Bart just needs to make some parts of his farm more efficient so that he can put in extra crops and take on some store lambs. He can also easily tweak his system to reduce 6kgN without significant risk to the business' viability.

Who was ECan really worried about for water quality? Who is worse off?

B+LNZ position: Everybody is responsible for their own N. Flexibility is critical for the survival of NZ's drystock sector. If you are farming within your environmental limits, you should be allowed to continue to do so.

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PC8

Part C: Good farming practices (policies)



These policies provide for

- Implementation of good management practices – GMP (this is a copy and paste from Canterbury)
- Progressive exclusion of stock from waterbodies,
- Winter grazing standards
- Setbacks and bare ground restrictions
- Critical Source Area ID and management

New definition of CSA

Definitions of Feedpad, Sacrifice Paddock, Stand-off Pad deleted

**How do you restore
your body back to
factory settings?
Is it kale?
It's kale isn't it?
Please don't say kale.**

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PC8

Part D: Intensive Grazing (Rules)



Permitted (you don't need a consent if):

- Total land area of landholding has no more 100ha or 10% of area in intensive grazing
- No intensive grazing in CSAs
- Stock progressively fed from top of slope to bottom
- 10m vegetated setback (not grazed) between intensive grazing area and any waterbody

Otherwise, you need a consent for Discretionary Activity.

What is intensive grazing?

Grazing of stock (all and any) on brassicas, beet, and root vegetables. Does NOT include pasture or cereals.



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Compare with FRESHWATER PACKAGE Intensive Grazing Systems – Winter Forage Crops



Winter grazing on forage crops

- **Low-lands (permitted)**
 - This is land below 10 or 15 degrees slope
 - Not more than 30ha or 5% [or 10%] property
 - 5m [or 20m] vegetated setback from waterbodies;
 - Follow strategic grazing principals
 - Protect critical source areas (no grazing);
 - No pugging above 20cm [or 10cm] for > 50% paddock
- **Hill country & activities that do not meet standards (consent)**
 - Grandparented to no greater than 2013/14 to 2018/19 years, &
 - Must have FW - FP



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PC8 Part E: Stock Exclusion



All dairy cattle and pigs must be excluded from lakes, continually flowing rivers >1m, and regionally significant wetlands.

A 5m setback is required from those waterbodies.

What are dairy cattle?

New definition, includes dairy grazers, weaned and unweaned calves of dairy cows, bulls, youngstock.

What is a continually flowing river?

A river wider than 1m at any point within the boundary of a landholding at its annual fullest flow without topping its banks.



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PC8 Part F: Sediment Traps (Rules)



Stock must be excluded from sediment traps.
This appears to include sheep

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Submissions



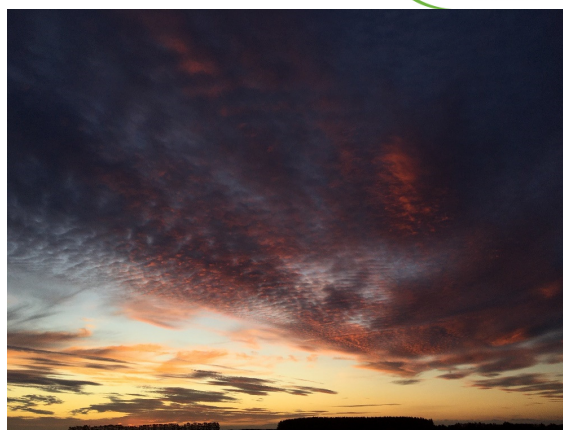
What can you do?

Make a submission on the plan change. This will affect you; your opinion matters.

Submissions are due by 5pm, 17 August 2020. You can email or post them, but you must send them to BOTH the EPA and ORC. Email and postal addresses are on the submission templates

Submission templates are on our website, along with some helpful submission resources

www.beeflambnz.com/news-views/otago--plan-change-7-and-omnibus-pc-1-and-8-plan-change



Essentially you need to say:

Oppose or support → why + how it will affect you → What you want instead

Poll: Do you want submission help?

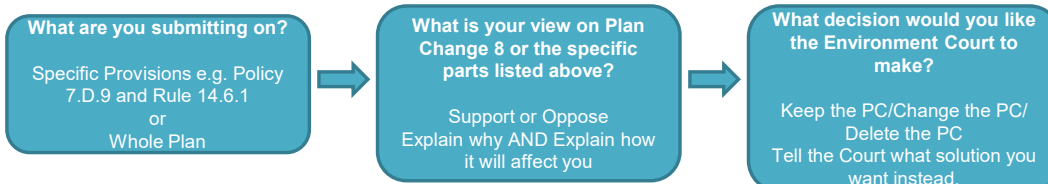
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Writing a Submission is Easy



The EPA Submission Template



Tell the EPA what parts of the Plan Change you like AND dislike

If there's a proposed change you like, say so. Otherwise it might get cut

Tell the EPA how the Plan Change will affect you

For each part of the plan you've identified – give a brief summary of why you 'oppose' or 'support' the provision

Tell the EPA what changes you would like them to make

Briefly say what solution you propose. Explain how you would like the plan changed

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Tips for Writing Submissions



Technical Advice

- ✓ MAKE IT EASY (to read)
- ✓ Be concise
- ✓ Structure!
- ✓ Keep like ideas with like ideas
- ✓ Avoid bad or archaic language
- ✓ This is not a vote. Don't just copy and past someone else's stuff

General Advice

- ✓ MAKE IT EASY (to say yes)
- ✓ Talk about yourself
- ✓ Offer solutions
- ✓ Write what you know
- ✓ A submission is a sales pitch
- ✓ Remain professional
- ✓ Remain constructive
- ✓ Remember audience and perspective
- ✓ Pick your words carefully: using 'i.e.' limits you to exactly what follows it.

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Need more information?



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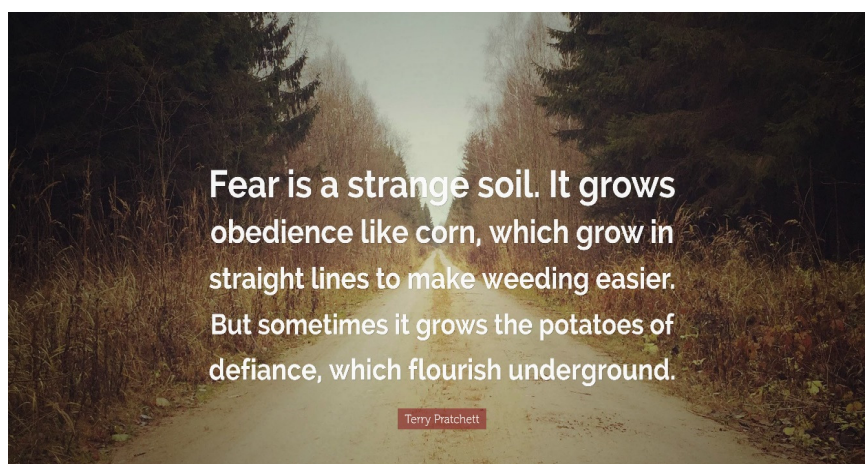


Post-Coronavirus males, displaying their Hunter Gatherer prowess in order to attract mates

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Questions



Terry Pratchett

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