

WORKING DRAFT

Implementation Plan for the Proposed Waikato Regional Plan Change 1 – Waikato and Waipa Catchments

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This document is subject to change as implementation planning progresses

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1 Introduction

The Vision and Strategy/Te Ture Whaimana seeks the restoration and protection of the health and wellbeing of the Waikato and Waipa rivers. To give effect to the Vision and Strategy, the Waikato Regional Council and Waikato River Iwi, as co-governors of the two rivers, formed a Collaborative Stakeholder Group (CSG). The CSG was tasked with developing a change to the Waikato Regional Plan that would achieve the objectives of the Vision and Strategy.

The CSG proposed achieving the Vision and Strategy over an 80 year timeframe and, as a first step, has recommended a change to the Waikato Regional Plan to improve water quality 10% of the way towards the 80 year targets in the next 10 years. The Proposed Plan Change 1 (PC1) was notified on 22 October 2016.

PC1 seeks to reduce the amount of nitrogen, phosphorus, sediment and microbial pathogens (the “four contaminants”) entering the two rivers from land in the catchment. The Plan achieves reductions in the four contaminants by requiring livestock to be excluded from water ways, and by requiring most farmed land to be managed under a Farm Environment Plan (FEP). An FEP consists of a property scale contaminant loss risk assessment and a tailored set of property specific actions that mitigate contaminant loss. To protect the water quality benefits to be achieved from the implementation of the tailored mitigation actions, PC1 also restricts a property owner’s ability to change their current landuse to a more intensive use that would result in an increased loss of contaminants.

The CSG recognised that achieving the 80 year water quality targets is likely to require land in the catchment to be allocated contaminant discharge rights. However, the CSG acknowledged that there is currently insufficient information available to make decisions on an appropriate allocation approach. To address this information gap, PC1 includes a range of research requirements to inform the development of an allocation framework for the next plan change process.

2 Implementation activities

Now that the proposed PC1 has been notified, the Waikato Regional Council has commenced the development of an implementation plan to guide decisions on resourcing and funding its implementation activities. The purpose of this document is to sets out the council’s initial proposal for implementing PC1. It is expected that this implementation plan will evolve as the plan change moves through the first schedule and as knowledge advances during implementation. Much of this implementation plan is relatively high level, and conceptual, and will be built on over time. There is much implementation detail still to be worked out.

PC1 will require a range of implementation activities to be undertaken by Waikato Regional Council and other key external stakeholders. Broadly, these activities fall into two groups;

- Activities related to achieving the short term (10 year) water quality objectives.
- Activities related to gathering information and conducting research to prepare for the next plan change along the 80 year journey to achieving the Vision and Strategy.

The activities required to achieve the short term (10 year) objectives can be further divided into four groups:

1. Activities that relate to monitoring the progress towards the PC1 objectives. In this plan these are set out in Section 8.1 “Plan effectiveness and environmental monitoring”.
2. Activities related to identifying and implementing the sub-catchment and property scale mitigation actions that will reduce the contaminant losses. In this plan these are set out in section 8.2 “Implementing farm environment and sub-catchment plans”.
3. Activities that relate to ensuring the mitigation actions are completed on time, and to the required standard, and in a fair and consistent way. In this plan these are set out in Section 8.3 “Regulatory implementation and industry schemes”.
4. Activities that relate to supporting the previous three groups, such as technology, systems, certifications and accounting and reporting frameworks. In this plan these are set out in Section 8.4 “Supporting activities”.

The activities relating to research and information gathering required to inform the next plan change are set out in Section 9 “Preparing for the next plan change”.

As well as having responsibilities to implement PC1, the council is also directly affected by the plan change, as a consent holder and land owner in the catchment. The implications for the council of complying with the requirements of PC1 are not within the scope of this implementation plan project. However, a separate project is underway to determine the impact on the council of complying with the plan change, and will be reported to the council separately.

3 Implementation principles and organisational impact

PC1 will introduce controls on land use in the Waikato and Waipa catchments that have not previously been used by the Waikato Regional Council and will likely necessitate new approaches to implementation.

Key areas where new approaches and skills are likely to be required include:

- Requiring, supporting and enabling the development of FEPs.
- Certifying independent third parties to make key technical decisions.
- Approving independently audited industry self-management schemes.
- Developing and adopting new information technology (IT) systems (and changing existing systems) to enable efficient implementation management.
- Developing and managing an accounting framework to publicly track progress toward reaching the plan’s objectives.

It is anticipated that the successful implementation of PC1 will require Waikato Regional Council to change from functioning on a consent by consent basis to managing activities spatially at property scale, in a much more integrated way. It is difficult to predict with certainty the other potential impacts on the organisation, but the changes required to implement PC1 are expected to be significant, particularly to front line service delivery functions. This is expected to lead to significant business evolution for the council and also potentially structural reorganisation to optimise implementation efficiency.

In recognition of the expected new ways of working under PC1, a set of principles have been agreed with the council (Waikato Regional Council Workshop 29 August 2016) to guide the development of this implementation plan. These principles are summarised below.

To implement PC1 the Waikato Regional Council will:

- 1. Be agile to respond to changing rules/policies and shifting contexts.*
- 2. Recognise that the council cannot deliver on implementation in isolation and that partnership and collaboration with external stakeholders will be vital to achieving the outcomes of PC1*
- 3. Ensure, where possible, that implementation approaches and tools are nationally consistent.*
- 4. Develop new internal competencies and skills, including supporting and enabling organisational culture change.*
- 5. Provide for additional (or redirecting) internal resources, facilities and training.*
- 6. Develop new systems and processes, including investment in technology to drive effective and efficient implementation.*
- 7. Implement new organisational routines, processes and policies.*
- 8. Consider new organisational structures.*
- 9. Ensure high levels of communication with stakeholders and landowners to enable change within the community.*
- 10. Ensure PC1 implementation programmes integrate with existing work programmes.*
- 11. Engage appropriate external expertise to assist implementation delivery as required.*

An aspect of PC1 that has become clearer through implementation planning is that it represents a significant opportunity to align a wide range of existing work programmes both within the regional council, and with other organisations, such as the Waikato River Authority and District Councils. Such alignment has the potential to magnify the benefits of the work programmes, beyond the scope of what might otherwise be achieved by each project individually. As a matter of principle, it is proposed that implementation be prioritised where alignment opportunities exist, and where this will maximise the benefit to water quality in the catchment.

4 Plan audience and scope

The primary audience for this plan is the Waikato Regional Council. The plan has been developed to guide Waikato Regional Council's implementation of PC1, with a focus on maximising the likelihood of achieving the PC1 objectives over the first 10 year period. This plan is written primarily to inform Waikato Regional Council in its setting of 2017/18 annual plan budgets, but also provides indicative cost information to assist with planning for Waikato Regional Council's long term plan (LTP) in 2018/19, and beyond.

The secondary audience for this plan are those external stakeholders that are expected to have a role in the implementation of PC1. The plan will assist key stakeholders to understand the council's initial implementation thinking. This is required to enable the council and key stakeholders to work together to further develop, refine and improve implementation activities, and to enable sectors to progress their own implementation planning. A unified, coordinated and aligned implementation approach with key sectors will be critical to the successful implementation of PC1.

This implementation plan is intended to detail the council's implementation thinking at the current time, focussing on implementing the notified version of the proposed plan change. As PC1 moves through the Resource Management Act schedule 1 process, it will be subject to change, and the implementation plan will need to change to reflect future iterations of PC1. Furthermore, implementation activities will continue to be refined as implementation progresses. It is anticipated that this plan will be dynamic, and that the plan will be regularly reassessed and fine-tuned, to ensure the most efficient and effective methods of achieving the objectives of PC1 are adopted.

Given the considerations above, this plan sets out the following:

- Broad implementation strategies and approaches that Waikato Regional Council will adopt to implement the key elements of PC1.
- A proposed work programme that Waikato Regional Council will need to undertake to ensure the PC1 can be fully implemented. This work programme focusses in detail on the next 12 month period, and sets out at a high level a 10 year view of implementation.
- Estimates of staff resources and direct costs required to implement the plan change with a particular focus on the 2017/18 financial year.
- A proposed project structure to manage the implementation of PC1 over the next 18 month period.

5 Waikato Regional Councils role in implementation

The regulatory approach adopted by PC1 to achieve the plan objective is different to previous regional plans developed by the council. PC1 introduces the concept of independently audited self-management as a key method for achieving improved water quality. This approach contrasts with the more traditional council regulatory approach of retaining control of any decision making under the RMA with the council.

This approach introduces a reliance on individuals, industries and/or sectors to firstly take up the various third party roles set out in the PC1, and then to undertake the critical functions and decision making that the plan assigns to these roles.

The implementation plan assumes that these third parties will effectively and competently carry out the functions anticipated by the plan change. The success of the approach will be reliant on the council establishing effective and credible auditing of the third party delivery, and assumes that the council will take more of an overseeing role in managing the functioning of the regulatory system that implements the PC1.

In this plan, the council proposes to adopt more of a role of setting standards, overseeing and auditing the functioning of the implementation system set up through PC1. This approach is premised on the view that in the long term, the best way to support land users to reduce their effect of water quality to grow the expertise and capacity within the rural sector that currently assists rural landowners with their business decision making. The alternative approach would be for the council to grow substantially to provide environmental advice for farmers, but it is considered this approach would be less credible to farmers, and less financially efficient.

6 Implementation management structure

The successful implementation of PC1 will rely on high degrees of integration, co-ordination and change management within Waikato Regional Council and externally.

To address these needs and focus on timely and effective delivery of implementation activities, it is proposed that the implementation of PC1 continue to be managed as a separate programme with its own project management structure to the end of 17/18 financial year. The programme of implementation activities will be delivered within a defined budget and resourcing over this period. Thereafter, the need to continue with a separate project management structure will be reviewed, as the implementation aspects of PC1 become more embedded as business as usual (BAU).

The proposed project management structure for the delivery of implementation activities over the next 18 month period is set out in figure 1 below. This structure is based around the delivery of implementation activities within five workstreams;

- Regulatory.
- Farm and sub-catchment planning.
- Information technology systems.
- Policy effectiveness, outcome monitoring and science.
- Communications and engagement support.

To ensure that the project can appropriately respond to policy changes that arise through the schedule 1 process, the project will be directly linked to this process through the policy effectiveness workstream.

The key components and roles within the proposed management structure include:

1. Formal political interface with the Healthy Rivers Wai Ora (HRWO) Committee and the council for decision making on implementation resourcing and to assist with support from key external stakeholders.
2. Establishment of an appropriate stakeholder implementation reference group to support the development of standards and protocols for farm plans, the design of auditing systems for industry schemes and certification systems.
3. Internal project governance through a steering group with direct link to the political interface.
4. A programme manager role to lead and provide oversight of all project workstreams and ensure that the programme is delivered to time, quality and cost overall. Programme performance in reference to this implementation plan will be monitored and reported on by the programme manager.
5. Project manager roles for each workstream to ensure activities are appropriately co-ordinated and delivered to time, quality and cost.
6. Workstream leads and supporting teams members to focus on the delivery of implementation activities.

In addition to the above components, consideration will also be given within the programme as to the need for other stakeholder advisory groups to assist with community engagement, integration and wider change management.

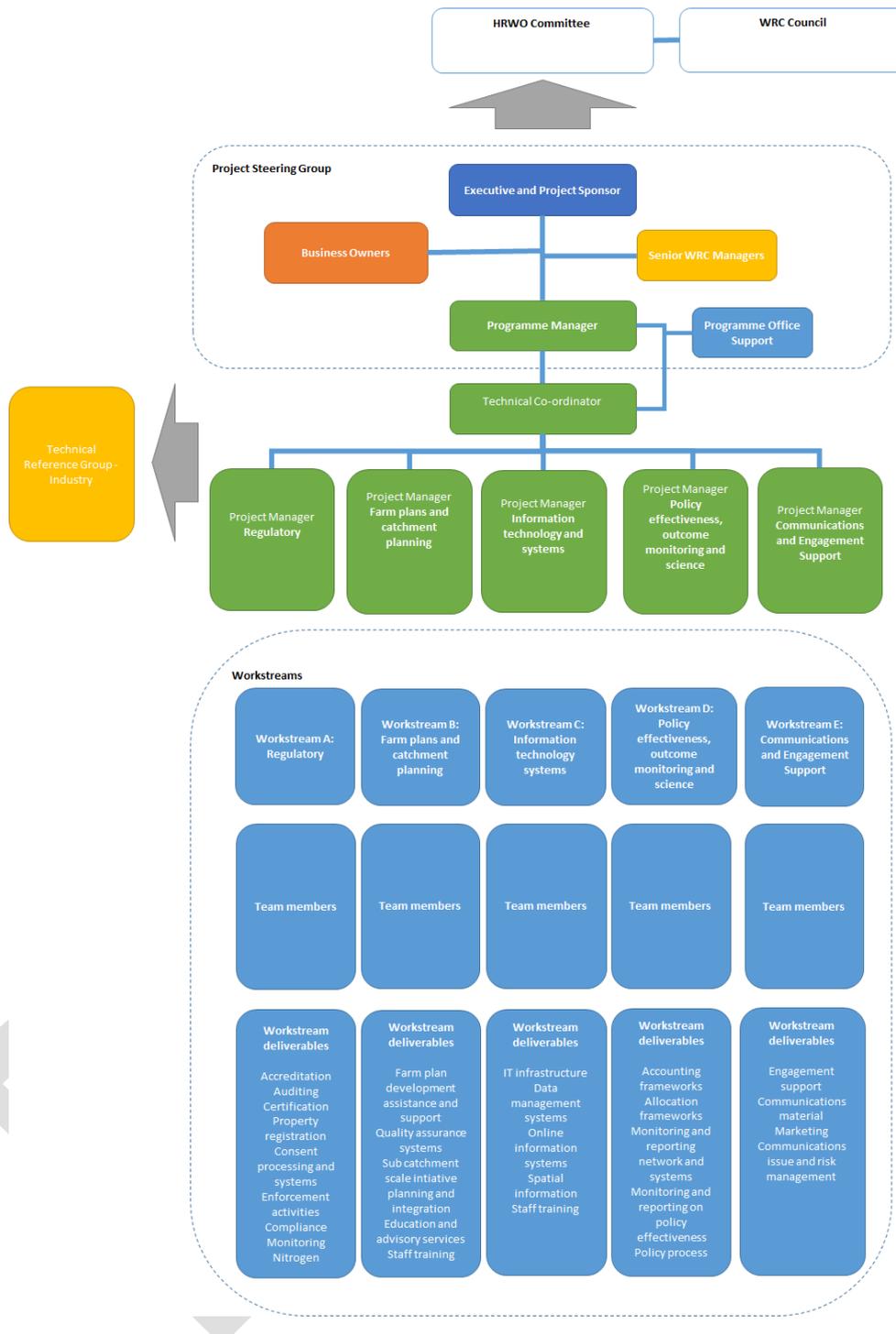


Figure 1: Proposed project management structure – HRWO implementation project

7 Implementation assumptions, constraints and dependencies

The development of this plan has relied on the following assumptions:

- That the implementation plan has been written based on implementing the notified version of PC1 (which had legal effect from its notification date 22 October 2016). The programme and costs set out within the plan have been based on delivering the required implementation activities to meet the timeframes and priorities set out within PC1.
- That as the first schedule process progresses, the provisions of the PC1 may change. Any change to PC1 has the potential to change the way in which the plan is implemented. The

only contingency within cost/resourcing/time estimates allowed for in the implementation plan is within the IT development elements.

- That existing Waikato Regional Council resources will be appropriately prioritised, allocated and aligned to support the delivery of the implementation within the required timeframes.
- That relevant key sectors will directly participate in implementation, industry schemes will be approved within the dairy and vegetable growing sectors, and most members of those sectors will join available industry schemes.
- That the private sector has the capacity, capability and intention to support the implementation activities required by PC1, particularly with respect to there being farm nutrient advisors and farm environment planners who are willing to be certified, and to undertake the independent third party roles envisaged by PC1.
- That the council will continue with its current strategic direction to move towards a more customer focussed operating model, supported by high quality information technology and data management systems.

Through the development of this plan a number matters have been identified that are likely to present significant implementation challenges. These include:

- The implementation and calculation of nitrogen reference points (NRPs) and compliance activities related to nitrogen limits.
- The difficulty in interpreting the requirements of rule 3.11.5.5 related to commercial vegetable production.
- The inconsistency between the requirements of schedule C and the requirements of schedule 1 related to stream fencing requirements.
- The practicality for the council of implementing the requirements of rule 3.11.5.7 related to landuse change.
- The need to clarify definitions/terminology/phrasing to minimise ambiguity/duplication in relation to implementation requirements.

It is proposed that these matters will be addressed and included in a Waikato Regional Council submission on the PC1. This implementation plan has made no assumptions about how these matters may be resolved, and is based on the notified version of the PC1.

8 Achieving the 10 year objectives

The implementation activities required to achieve the 10 year PC1 objectives have been aggregated into four groups. For each activity group, the purpose of the activities, an overview of how implementation is proposed to progress and an assessment of the resourcing and cost implications for the council are described in the following sections. A summary of estimated cost and resource requirements are presented in Section 11 of this plan.

8.1 Plan effectiveness and environmental monitoring

The following group of activities relate to tracking the progress towards achieving the objectives of PC1. The council proposes to monitor the achievement of the PC1 objectives by:

1. Monitoring and reporting on trends in water quality, to track progress towards the 10 year and the 80 year attribute targets.
2. Monitoring and reporting on the completion of farm mitigation actions.
3. Monitoring and reporting on indicators of social, cultural and economic wellbeing.

Water quality

Monitoring of water quality will require an expansion of the council's existing water quality monitoring programme. Currently, the programme collects most of the information required to monitor the achievement of the water quality objectives under PC1. The river and stream monitoring network will need a modest expansion to monitor 12 new sites and several new parameters. The lake monitoring programme will require significant expansion to be able to demonstrate achievement of the lake water quality attribute targets. The monitoring of sediment will require a whole new monitoring programme, including the installation of infrastructure at 10 dedicated new monitoring sites. It is proposed to investigate whether clarity can be used as a proxy for sediment prior to investing in a sediment monitoring programme, as water clarity is a parameter currently monitored by Waikato Regional Council, and is the parameter used in the short and long term water quality targets set out in table 3.11-1 of PC1.

The existing council data bases (e.g. IRIS and WISKi) are expected to be able to store the additional water quality monitoring data that will be collected.

The completion of property scale mitigation actions

The completion of mitigation actions through FEPs will be monitored by tracking mitigation action completion data reported by landowners through the Councils yet to be developed portal (see section 8.4). Data will be stored in the Integrated Regional Information System (IRIS), and will be reported through a web based publicly available accounting system.

For those properties operating under an industry scheme, it is anticipated the completion of mitigation actions will be reported from the schemes IT system through a data interface directly into the council's portal.

Independent third party audits and/or the council's compliance monitoring will verify the mitigation action completion data reporting as accurate.

The council's IRIS database will be used to store mitigation action data. It is expected that some modification of IRIS will be required to enable mitigation action data to be stored. The cost of modifying IRIS to collect and store mitigation action completion data has been included in the cost estimates for the supporting activities section of this report.

Social, economic and cultural wellbeing indicators

It is currently unclear how to best monitor the social, economic and cultural wellbeing objectives of PC1. The council already monitors 32 progress indicators in the region under its Waikato Progress Indicators programme. The council proposes to review the suitability of using the Waikato Progress Indicators as indicators to monitor the social, economic and cultural objectives of the plan. The council also proposes to engage with other agencies (such as Waikato River Authority (WRA)) who have indicator programmes that also may be useful. If none of these indicators prove adequate, the council will need to develop new indicators to monitor these objectives. The cost of developing these indicators has been included in the cost and resourcing estimates provided in section 11 of this report.

Reporting

PC1 requires that the results of plan effectiveness monitoring are reported through a publicly available accounting system. The council intends to achieve this using a web based platform. This web based reporting tool will need to be developed, and is additional to current council online reporting. The data to inform the accounting system will be collected through several council systems, and will include both environmental quality information, and farm mitigation action information. The cost of developing these reporting systems are included in the costs of the supporting activities in section 8.4

8.2 Implementing farm environment and sub-catchment plans (SCPs)

The following group of activities relate to enabling landowners and occupiers to calculate their nitrogen reference point, undertake an on farm risk assessments, and develop effective Farm Environment Plans (FEPs).

Nitrogen reference point

It is expected that approximately 5000 properties will need a NRP calculated. The NRP must be submitted to the council during the registration period, being 1 September 2018 to 31 March 2019. Getting 5000 landowners to recognise they need an NRP, and to engage a certified farm nutrient advisor (CFNA) to calculate it between now and March 2019 is expected to be a challenging component of implementation.

NRPs must be calculated by CFNA. The council's proposed implementation of certification for nutrient advisors is discussed in the regulatory implementation section (section 8.3) of this document below. In the absence of any other currently approved model, it is assumed that NRPs will be calculated using Overseer®.

The council expects to be in a position to start certifying farm nutrient advisors by mid-2017 (refer Section 7.3). The council proposes to run a promotional campaign to engage relevant landowners/occupiers on the need to retain relevant farming records, and to complete an NRP by the required date. This campaign is further described in the council's Healthy Rivers/Wai Ora Communications and Engagement Plan. In addition, the council will engage with key sector groups (such as fertiliser companies, and farm consultants) to make use of their networks to support the completion of NRPs. The council will also establish a register of CFNAs, and display this on its website to connect landowners who require an NRP with appropriately certified professionals.

Landowners/occupiers will be responsible for contracting a CFNA of their choice to model their farm system in Overseer®. It is expected that CFNAs will be rural professionals who already provide services to farmers, such as fertiliser company representatives, or independent farm consultants. Market capacity to deliver these services to landowners, at the required scale, has been scoped at a high level during the development of this implementation plan and this scoping has indicates that the necessary capacity is, or will be available.

The NRP consists of the overall nitrogen leaching value Overseer®, and the base overseer electronic file containing the parameters used to populate the model. The base electronic file will be uploaded to the council portal, and verified by the land owner's CFNA as being correct.

The estimate of the council's costs in implementing the NRP are associated largely with developing the portal, which is discussed in section 8.4. However, there are other potential costs associated with managing the NRP on an ongoing basis which were not able to be estimated. The PC1 does not currently provide a mechanism for dividing or amalgamating NRPs when subdivision or property purchase occurs. The process for managing NRPs during subdivision and amalgamation, and therefore the scale of the impact on the council, will remain unclear until after decisions are made in the first schedule process in late 2018. No allowance has been made for this in the proposed budgets.

An unknown but potentially substantial resource cost is the anticipated engagement associated with following-up on the non-completion of NRP. In scoping this implementation plan, it has been assumed that collectively a high level of completion of NRP submission will occur. A limited budget allowance has therefore been made for following up non-completion of the NRP. The resourcing implications of large numbers of properties not submitting appropriate NRPs has not been included in the proposed budgets.

Farm environment plans (FEPs)

FEPs are the primary risk identification and mitigation tool for managing losses of the four contaminants which are the focus of PC1. For members of industry schemes, the scheme will have an appropriate processes for developing and implementing FEPs which has been approved by the council. For properties that are not part of an industry scheme (section 8.3), PC1 sets out a process whereby the council sets standards and certifies the farm environment planner (see section 8.3). The council will maintain a register of certified farm environment planners on its website.

The process set out in PC1 to develop an FEP requires that:

- a landowner/occupier contracts their choice of farm environment planner to assist them to undertake the risk assessment, develop the list of mitigation actions, and identify the deadlines for when those actions must be completed.
- The certified farm environment planner approves the FEP, and it must be submitted to the council as part of the resource consent application via the online portal.
- The council then processes the resource consent.
- the landowner/occupier commences completing the actions required in the FEP, and confirm to the council when those actions are completed.

PC1 requires that FEP risk assessments will have regard to the sub-catchment targets set out in table 3.11-1 of PC1. Waikato Regional Council proposes to develop guidance notes for certified farm environment planners (CFEPs) on how CFEPs should have regard to the sub-catchment targets.

Waikato Regional Council also proposes to develop a sub-catchment profile for each sub-catchment, to engage farmers in the particular challenges the sub-catchment is facing and the opportunities available to address those challenges. The sub-catchment profile will provide context around the water quality in the sub-catchment, the pressures on water quality, potential or likely causes of water quality decline, and possible mitigation actions that may help to reduce contaminant losses. The profile would also include sub-catchment ecosystem information, and describe opportunities within the FEP implementation for achieving ecosystem enhancement. The sub-catchment profile will be a summary of the collective knowledge about the sub-catchment, and is intended to assist farmers and

certified farm environment planners to produce more effective farm plans. The council proposes to complete the sub-catchment profiles by mid-2019 for the 34 tranche one sub-catchments.

One of the key challenges associated with implementing the FEPs will be engaging landowners with the FEP process. Waikato Regional Council also recognises the need to provide options for FEP development that are appropriate to different scales of farmers.

It has been assumed that farmers in an industry scheme will be supported in developing their FEPs by the scheme operators. As discussed in section 8.3, it is assumed that industry schemes will be set up in the dairy sector, and for commercial vegetable growing. Provisions for supporting the roll out of industry schemes have therefore focused on the drystock sector.

To support landowners/occupiers who aren't operating under an industry scheme, Waikato Regional Council proposes to facilitate a focused engagement process in each sub-catchment to maximise the uptake of the FEP process. The council also proposes to work with sectors to develop self-help solutions to enable farmers to develop their own draft FEP. An example of this tailored engagement process that is being discussed with Beef and Lamb NZ includes community or small group meetings to raise awareness of the sub-catchment profile, then a series of Beef and Lamb New Zealand (B+LNZ) land environment plan (LEP) workshops to assist farmers to develop a draft FEP. These draft plans would then be reviewed by the certified farm environment planner during a farm visit, prior to refinement and finally approval. It is expected that this process would be rolled out to all sub-catchments over the life of the plan, prioritised to tranche one sub-catchments first, followed by tranche two, and then tranche three. A key assumption in the successful delivery of this approach is the support of Beef and Lamb to assist engagement.

FEPs are proposed to be held electronically in the online farmer portal associated with a registered entity's registration data and NRP data, rather than as physical paper report. This format will allow for streamlined administration of future changes to the FEP, as well as much more automated data aggregation, and more efficient population of the publicly available accounting system which reports progress against the achievement of property scale mitigation actions. It is proposed that the data would be available to populate a paper report (e.g. either on its own or as part of a broader farm plan prepared by an industry scheme or a farm consultant) if the industry scheme or farm environment planner wished to do so. In addition to the registration metadata, the FEP will record each risk identified on farm, one (or more) proposed mitigation actions to address each risk, timeframes for the completion of each action, and the identification of any co-benefits.

The council proposes to develop draft templates and minimum standards for the FEP content by March 2017. These will be based on templates used by other councils, the results of Waikato specific trials, and engagement with key sectors. The council is supportive of developing nationally consistent templates and minimum standards (which can account for regional differences).

The minimum standards for FEPs will be used to define the certification and assessment process for CFNAs, and certified farm environment planners (CFEPs) by 30 June 2017.

The development of the standards and templates for the FEPs, and the facilitation of land owner engagement in the sub-catchment profiles will be achieved by redeploying the existing resources within the Land Management Advisory Services team.

The development of the sub-catchment profiles will be completed using a combination of existing catchment management officer resources, and external contractors and consultants.

Sub-catchment plans (SCPs)

PC1 requires that SCPs be developed where “it has been shown to be required” (implementation method 3.11.4.5). PC1 does not specify the circumstances when a SCP may be required.

The council proposes that SCPs be used as integrating documents to enable greater progress to be made towards the objectives of PC1. The council proposes that the following circumstances constitute situations where a SCP may be required:

- Where developing an SCP will help to access external funding to assist with the completion of mitigation actions or activities.
- Where the priorities of Waikato Regional Council (and of other organisations) warrant working together with the community and where it will result in better overall outcomes.
- Where co-ordination is required across the sub-catchment to efficiently deliver mitigation actions at a broader scale than the property scale.
- Where there is community demand for an SCP as a result of community involvement in the FEP engagement process.

SCP engagement processes are expected to require considerable consultation with local communities. It is expected that the size and scale of the SCPs will vary according to the issues of relevance to the sub-catchment. However, it is recognised that broad scale SCPs (for example, similar in scale to the Waikare Whangamarino Plan currently under development) are time consuming and resource intensive to develop and implement. This implementation plan has assumed that a maximum of 25 per cent of the existing sub-catchments will require a SCP. The implementation plan does not anticipate developing SCPs in the early stages of implementing PC1, rather it will focus on developing and completing the sub-catchment profiles discussed under the FEP process above. It is noted the SCPs in priority 1 catchments may not be able to be completed by the date FEPs are due in the priority 1 catchments. To account for this, it is proposed that FEPs will take account of any relevant SCP when the FEPs are reviewed.

PC1 sets out a particular method related to sub-catchment planning in lake sub-catchments. This method broadly coincides with the council’s current approach to managing lakes. The council proposes to continue to implement lake management plans, either by supporting the owners of the lakes (which may be farmers, territorial authorities or government departments) to develop these plans, or where required by leading the development of the plans itself. The sub-catchment profiles referred to in the FEP section above will also incorporate lake information, as well as information on pest weeds and fish. The FEPs on properties within lake sub-catchments will have to have regard to the lake water quality targets, and it is expected that the contaminant load to lakes will decrease as FEPs and their actions are progressively implemented.

8.3 Regulatory implementation and industry schemes

Overview of regulatory implementation

It is proposed that the regulatory implementation of PC1 be managed within a framework similar to the regulatory implementation of variation 6. It is proposed that a project manager be appointed early in 2017 to oversee the development and implementation of the regulatory elements for PC1. This role would be need to be supported by two full time equivalents (FTEs) to be recruited in 2017/18 that would focus on the development aspects of implementation, as well as processing any resource consent applications that might be made, prior to the bulk of controlled activity consents under rule 3.11.5.4 from 2020 onwards.

The activities undertaken by these staff would include developing systems, resources and processes for efficient consent processing and compliance monitoring activities, business owner involvement in IT system development, developing and running training for staff about consenting and compliance under PC1, responding to enquiries, and assisting the Land Management Advisory team with property scale engagement in the regulatory processes. These resources may need to be supported by external experts to complete specialised tasks, such as developing the audit systems and protocols. Collectively, it is expected that all of the regulatory implementation activities for the 17/18 year will be able to be completed by these three FTEs.

Registration

Registration will occur via the council's online portal (discussed in Section 8.4 below). Registration will require users to establish a verified login, which will be able to be associated with one or more properties. The registration data will form part of the information that identifies baseline land use in the Waikato and Waipa catchments.

It is proposed that registration be available only on the online web based portal i.e. without a paper based registration process being available. Having an electronic registration process will eliminate considerable administration costs from the plan implementation and is consistent both with the council's customer engagement strategy to develop more self-help and online support tools, and with the Government Information Communications Technology (ICT) Strategy that new services be digital by default. It is proposed to establish a programme to assist with registration (for example for those without access to a computer or the internet) perhaps via a drop in service in the various catchments, and subsequently by appointment at the council offices. It is estimated that there are approximately 10,000 properties in the Waikato Waipa catchments that will need to register. The practical viability of adopting an e-registration only process will need to be confirmed. The costs of registration for 17/18 relate to developing the portal, which is discussed in the portal section (section 8.4) below.

An unknown but potentially substantial resource cost is the anticipated engagement associated with following-up on the non-completion of registration. In scoping this implementation plan, it has been assumed that collectively a high level of completion of registration will occur. A limited budget allowance has therefore been made for following up non-completion of the registration process. The resourcing implications of large numbers of properties not registering has not been included in the proposed budgets.

Approval of industry schemes

Industry schemes are intended to provide an alternative mechanism to enable sector or industry organisations to assist their members to meet the policy objectives of the PC1. Schemes are most likely to eventuate where a particularly sector or provider is willing to take on the role of facilitating the development of registration, NRPs and FEPs for their members, and where taking on them taking on this role is likely to offer a more desirable process for their members to achieve the policy objectives. It has been assumed that industry scheme's will handle all aspects of engaging with their members, assisting their members to understand and comply with the expectations of the plan change, and submit summary data to the council to demonstrate the scheme's efficacy at ensuring its members deliver on the PC1 expectations. Farmers operating under an industry scheme will be expected to meet the same standards of risk assessment and mitigation implementation as consented farmers, and the same standard of reporting.

The council anticipates that organisations wishing to set up an industry scheme will submit a detailed application to the council setting out how the scheme intends to meet the requirements of schedule 2 of the plan change. Approval of the industry scheme will be based on whether the council is satisfied that the scheme proposal is sufficiently comprehensive and robust to give the council (and ultimately the public) confidence that the scheme members will achieve the actions set out in the plan change.

The engagement undertaken while developing this implementation plan has identified two entities that are strongly considering seeking the certification for industry schemes. These entities relate to the dairy sector, and the vegetable growing sector. In developing this implementation plan, it has been assumed that the majority of members of these sectors will join the industry schemes. While there is potential for other industry schemes to be developed (e.g. servicing the drystock sector), for the purposes of this implementation plan it has assumed that the remainder of farms within the PC1 catchments will operate under a consented regime.

Waikato Regional Council proposes to initially review the approval systems of other councils before deciding whether it needs to seek external advice to develop its scheme approval processes. This review is proposed for quarters three and four of 2016/17 FY.

The council also proposes to continue to engage with any entities that are considering seeking approval for an industry scheme to ensure alignment between the sector's proposed approach, and the council's needs.

Consent processing

At least initially, consents will be processed internally by Waikato Regional Council staff. It is expected a number of new activities over and above BAU will be required to build internal knowledge and capacity prior to significant numbers of new consent applications being lodged starting in 2020. Processing of the additional consents is expected to peak as each tranche FEPs are due, over the period 2019/20 and 2025/26. Demand for technical expertise to support the processing of consent applications (particularly the restriction discretionary activity (RDAs) and non-complying activity (NCAs) will be required over the same period. Consent processing is expected to be funded through the application of the councils existing funding policies, and on a cost recoverable basis.

Activities such as developing internal training and familiarisation regarding PC1, as well as developing application information resources are likely to be required from 2017/18.

The additional regulatory requirements are likely to drive increased demand for advice and information. It is expected that the Councils existing regulatory freephone resources would handle most calls, with more complex or specialised enquiries being handled by the regulatory workstream team.

It is expected that some configuration changes may be required to IRIS to support consent processing as part of implementation. This cost has been accounted for and included in the budgets for IT system development in the supporting activities section of this report.

Certification of nutrient advisors and farm environment planners

The certification of CFNAs is a pressing demand in order to enable the delivery of NRPs by the end of March 2019.

The NRP represents a fundamental piece of information, the calculation of which has significant implications for land owners as well as the plan objectives. An underestimation of an individual NRP may unfairly constrain a landowners management options on their property, while widespread overestimation may put at risk a key policy objective of the CSG to stop the gradual increase in N loss that has been occurring across the Waikato Waipa Catchment. Furthermore, the NRP represents a baseline input to the FEP process, which will potentially drive the scale and significance of property scale mitigation actions.

Other councils who have adopted nitrogen restrictions have reported landowner frustration and disengagement associated with being given inconsistent estimates of nitrogen loss by different professionals based on the same farm system. While to a certain extent this risk can be mitigated by strict adherence to data input standards, ultimately nitrogen modelling estimates are highly reliant on the expertise of the individual modeller.

Currently the PC1 proposes a fairly elementary level of minimum qualification for CFNAs. However engagement during the implementation planning process has identified concern among some stakeholders that this minimum qualification may be too elementary. The minimum qualification for CFNAs is expected to be a point of submission to the PC1.

In light of the importance of the NRP, and the uncertainty around the appropriateness of the current minimum standards of qualifications and experience, the implementation plan proposes a cautious approach is warranted with regards to who is certified as a CFNA until there is greater certainty regarding the PC1 minimum requirements.

The council has considered setting up its own certification programme. However, setting up a robust and credible process is likely to be expensive and resource intensive. In addition, it does not make sense for each regional council to set up its own differing certification programme, potentially leading to companies that operate nationally needing multiple certifications to do the same work in different regions.

The fertiliser association operates a nationally available nutrient management advisor certification programme (NMACP) currently. The programme is considered robust, and appears to have all of the elements of an appropriate certification programme. The council considers a person certified as a certified nutrient management advisor (CNMA) under the NMACP would meet the requirements of PC1 to be certified as a CFNA.

There are currently approximately 150 individuals nationally who hold the CNMA qualification under the NMACP. There has previously been concern that restricting the NRP role to holders of the CNMA qualification may unreasonably limit the pool of people available to do the work needed under PC1.

The council has had initial conversations with the NMACP, and is open to exploring opportunities to increase the pool of people who hold this qualification.

The council proposes to certify individuals who hold a CNMA qualification as certified farm nutrient advisors for the purposes of PC1.

The certification of CFEPs is less urgent, as FEPs are not required to be submitted until 2020 for tranche one farms. The council considers that a national certification programme for CFEPs would be advantageous for many of the same reasons set out for CFNAs above. It is proposed that the council will engage with central government, other regional councils and rural sector stakeholders to explore the possibility of setting up a national CFEP programme to meet the needs of PC1.

The council has estimated that ten to fifteen full time equivalent CFEPs and CFNAs would be sufficient to be required to develop the plans and the NRPs for those farms not registered to an industry scheme, assuming that a dairy industry scheme is certified and retains its own advisors, and the majority of dairy farms become members. It is unlikely that consultants will specialise in the provision of FEPs, but will instead incorporate this into their work with their existing client base. It is not known how the industry will adapt to market their service to a much wider client base than who currently engage farm consultants, particularly in the drystock sector. The council's enquiries have indicated there are likely to be sufficient numbers of suitably skilled/experienced people in the market place to provide these services to land users, with the exception of the soil conservation and sediment management skills. The council proposes to run training programmes (including certification of competence) to upskill advisors in soil conservation and sediment management knowledge, in a similar way to how the council has run earthworks and sediment control workshops for many years with the earthworks industry.

Auditing

The council anticipates four levels of auditing will be required to effectively implement PC1.

1. Auditing of industry schemes, to ensure the scheme is being implemented to the standard required by its approval.
2. Auditing of CFNAs and CFEPs to ensure that Overseer files calculating NRPs are being completed correctly, that advisors are robustly identifying appropriate farm risks, and that the appropriate mitigation actions are being included in FEPs.
3. Auditing to ensure that mitigation actions in FEPs are completed on time, and to an appropriate standard.
4. Auditing of the records that verify the NRP Overseer input parameter data

The auditing of industry schemes will need tailoring to the specific scheme. The council proposes to work with the industry scheme operators to develop appropriate audit protocols. It is expected that the scheme will contract an independent auditing organisation to conduct the audit. The results of that audit will be provided to the council, and will be made publicly available. The council does not necessarily anticipate undertaking audits of industry schemes itself provided third party auditors are independent, experienced, and credible. The council anticipates developing an appropriate cost recover mechanism to recover the council's costs associated with managing industry schemes from the industry scheme provider.

The council proposes to audit every certified professional who provides any service under PC1 in a given year. Every certified professional who either undertakes an overseer assessment, or approves a FEP will have at least one, or up to a maximum of 10% of their overseer files/FEPs audited each year. As a minimum, the auditor will hold the same certification as that held by the professional being audited. It is proposed that these audits will be carried out by suitably qualified and experienced council staff initially, but may be contracted to third parties in future. It is anticipated that audit frequency will be determined on a risk basis, and can be less frequent once certified professionals develop a history of competence performance.

The council intends to investigate the viability of setting up an independent third party monitoring system to verify the completion of property scale mitigation measures set out in FEPs created under the controlled activity landuse rule (3.11.5.4). It is anticipated that if such a system was found to be viable, farm professionals could be certified to monitor and confirm to the council that the FEP mitigation actions have been completed, thereby avoiding the need for the council to undertake its own on-site compliance monitoring. The council would have a role in auditing the third party monitoring to ensure its robustness and its reliability. It is assumed that there will be widespread uptake of this third party monitoring among consented farmers. The council proposes to review the scheme operated by Environment Canterbury during 2017/18, to consider its relevance and applicability to the Waikato and Waipa catchments.

The Council recognises that the NRP process may be open to exaggeration or gaming. The Council intends to randomly audit a selection of NRP Overseer files and request the records that support the input parameters used to calculate the NRP. The Council intends to structure that audit process to create a significant disincentive to use input parameters that cannot be verified with appropriate farm records.

Compliance monitoring and enforcement

The council proposes to develop a risk based compliance strategy to target most of its compliance monitoring to those activities where non-compliance is expected to have the greatest potential effect on the objectives of PC1. It is expected that the council's compliance monitoring activities will be targeted to those farmers who chose not to engage with third party monitoring, but will also involve random monitoring to ensure the third party monitoring is operating effectively.

The council does not propose to proactively monitor activities authorised by permitted activity rules 3.11.5.1 or 3.5.11.2. Compliance with these permitted activities will be dealt with by complaint response and through promotional activities to encourage compliance.

It is anticipated that Industry scheme operators will monitor and report on the progress of their members at achieving the requirements of their FEPs, which will be confirmed by audit processes.

The frequency and nature of consented activity monitoring will need to be determined once the risk based compliance strategy is developed.

It is anticipated that the compliance monitoring programmes can be developed and implemented within the resources outlined in the regulatory overview section above.

8.4 Supporting activities

This section describes a series of supporting activities that are required to ensure the other groups of activities can be implemented as effectively and efficiently as possible. These activities relate mainly to IT systems process development, and communications and marketing.

Web portal

The web portal is the key supporting IT infrastructure required to enable the efficient and effective implementation of PC1. Without the portal, it is questionable whether the implementation of PC1 would be financially viable.

At a conceptual level, users will create a unique login to the portal when they register that will enable them to:

- record and update their details
- access council held information relevant to their property
- provide property scale information about their property
- upload files and data to meet their regulatory obligations
- apply for required resource consents
- access their compliance information

The portal will provide access to soils, slope and waterway information relevant to the properties they are responsible for, access contextual information about the relevant sub-catchment, complete registration, upload NRP data, submit FEPs, and give access to their certified professionals to approve/upload data on their behalf.

The portal is a complex piece of IT infrastructure which will need specific development. It is expected to require significant investment. Currently there is no existing system with the same functionality being used anywhere in New Zealand, although Environment Canterbury operates a portal with some of the functionality that will be required for the portal to implement PC1.

To minimise cost, the preferred approach is to reuse an existing solution and repurpose it for PC1, and to that end Waikato Regional Council supports the concept of working with other organisations (councils and stakeholders) to develop a single nationally applicable portal that can enable more efficient and effective management of land use activities. However, it is recognised that this approach may not be able to deliver an operational system within the timeframes set by PC1. The council intends to begin the process of developing its portal in early 2017.

To enable the certified industry schemes to share registration, NRP and FEP data with the council, a data sharing interface will be developed to operate alongside of the portal. There are existing solutions available on the market, but it is not yet clear to what extent they meet the council's requirements.

Accounting system

The accounting system will be derived from the following components of the PC1 implementation infrastructure;

- Data collection
- Data storage
- Data reporting

The accounting system will use the data collected as set out in the plan effectiveness monitoring section of this report. The data will be stored in the council's existing databases. The databases are currently able to store environmental quality information, but are likely to need upgrading work to store some of the property and sub-catchment scale mitigation action information. The data will be reported publicly via the council's website, or the portal

Internal process and system changes

There will need to be internal process and system changes to enable the integration of new IT systems with existing Waikato Regional Council IT systems. It is recognised that the implementation of PC1 will require fundamental changes to the council's internal IT systems and processes for customer management, consents, enforcement and monitoring, as well as the property and sub-catchment mitigation action data discussed in the previous section.

These changes will require modification to IRIS and other internal systems. A provision has been made in the implementation budget for resources to deliver these changes.

Communications and Marketing

The process of engaging the community in the objectives and methods of PC1 will require strong communications and marketing support for the implementation project. It is expected that a specific marketing plan will be developed to promote the various key elements and actions required by the plan change. It is proposed that once submissions close, the promotional activities of the council will need to refocus from the first schedule process to implementation.

A separate communications and engagement plan has been developed to guide the council's communications and engagement activities. The budget to fund the implementation communications and engagement has been included in section 11 of this implementation plan.

9 Preparing for the next plan change

The plan change requires that a range of activities are undertaken in preparation for the decisions that must be made at the next plan change including research into;

- The relationship between landuse, contaminant discharge and water quality.
- The development of an allocation discharge framework.

Research

The council proposes to draw on the technical resources engaged as part of the CSG process to develop a literature review, and a research plan to better understand the relationship between land use, contaminant discharge, and water quality. It is intended the review will identify current knowledge, any knowledge gaps that need to be filled, and propose a research plan to gather the knowledge required.

PC1 anticipates that the council will investigate systems for allocating contaminant discharge rights at a property or enterprise level. This is a challenging objective, and it is not currently clear how this might be done. As part of the research plan discussed above, the council will seek that the research proposal identifies a way to advance the state of knowledge about how to define land suitability, and the opportunities that may exist to allocate contaminant losses using land suitability as a concept.

10 Key implementation risks

There are a number of significant risks to the success of the implementation project that will need to be managed effectively to ensure the success of PC1 is implemented effectively. It is expected that the implementation plan has not identified all possible risks, nor that all risks are even able to be known currently, but this section sets out some of the key areas of risk that have been identified.

Engagement

Successful PC1 implementation will rely on every landowner in the catchment doing what is required of them. This implementation plan has been developed on the assumption that high levels of engagement will occur. If this assumption proves incorrect, there will be considerable challenge in successfully implementing the plan change within the plan's current timelines. The current implementation plan budget does not make allowance for widespread resistance to engaging in the obligations created by the plan change.

Sector participation

In variation 6, an extensive collaborative engagement programme was developed between the council and the dairy industry to maximise engagement with farmers to apply for a resource consent to authorise their water use under variation 6. In the case of variation 6, the stakes for a dairy farmer of not engaging were arguably higher than in PC1, because the failure to lodge an application for resource consent by the deadline introduced a risk that the farmer may not be able to legally access enough water for their business to continue to operate. Despite multiple points of contact (such as media, personalised letters, and extensive advertising), some farmers still required one or more personal phone calls from dairy sector representatives outlining the critical business risk they faced in order to get the farmers to engage. Furthermore, variation 6 farm water consents were only required by dairy farmers, a sector that is comparatively much more engaged with the Waikato Regional Council than some sectors affected by PC1.

Under PC1 it is expected that most dairy farmers will operate under an industry scheme, and that the majority of farmers who will need to engage with the council will be drystock farmers. As a group, this sector generally has had a much lower level of engagement with Resource Management Act (RMA) processes than dairy farmers. In addition, there is no critical business risk faced by the farmers should they choose not to engage. Engagement may potentially be challenging and time consuming.

It is unknown whether the sectors will be willing to commit sufficient engagement resources to implement PC1, in a similar way to what they did to implement variation 6.

The council proposes to run some trial engagement process with several small to moderate sized catchments to test its engagement methods and community responses. This will help the council to identify effective engagement approaches, and to estimate costs and resource needs. This information will be used to refine the PC1 implementation budgets for the Councils Long Term Plan for the 10 year period commencing in 2018/19.

First schedule process

The development of this implementation plan has identified a number of practical implementation and interpretation issues within the current rule framework. The areas of most concern relate to the nitrogen reference point, the commercial vegetable growing rules, the landuse change rules, and a number of interpretation issues. The plan change will require changes to make it practicably implementable. These issues will need to form part of the council's staff submission on the plan change.

A number of critical implementation dates in the plan occur prior to the time that the proposed plan is likely to become operative. It is expected that actions such as registration, submission of NRP data, lodging some FEPs and processing of some resource consents will be carried out under provisions that may later change. There is a risk that any subsequent rule changes may require all of the actions already completed to be revisited. For example, if landowners and occupiers complete the 2000 FEPs required under the first tranche of the proposed plan, and then the FEP process is changed either in the council decision or any subsequent environment court appeal, there is a risk the plans may need to be done again, or possibly have to be accepted, but may not be fit for purpose. This risk either leads to increased cost and workload for all parties, or reduces the effectiveness of the plan change.

This implementation plan is dependent on the form and content of the existing plan change. Any changes to the plan change through the first schedule may change the implementation approach and resourcing estimates. For example, if the requirement for registration was removed from the plan change, the requirements for the web portal IT system would be fundamentally changed, and would need to be revisited.

There is significant risk in investing the sums of money required to implement PC1 while decisions on the form and content of PC1 are not yet made. However, there is also a significant risk that if the council delays starting implementation, the key implementation elements (such as the IT systems, the regulatory systems, and the certification systems) will not be ready in time to meet the deadlines set out in the notified version of PC1, thereby preventing large numbers of land users from being able to become compliant with the new rules.

On balance, the Council has decided to continue with implementing the key regulatory and IT systems to meet the existing PC1 deadlines, while also asking through its submission that the deadlines be re-examined for practicality.

Reliance on third parties

The plan change introduces the use of independently audited self-management as a method for achieving PC1s objectives. It certifies independent third parties to make decisions about the

appropriateness of mitigation actions, and through implementation, these third parties may also be certified to audit the completion of these mitigation actions. This may be an uncomfortable space for some farm planners, whose current business model is based around helping farmers to achieve what they want to, rather than telling farmers what they can and can't do. There is a risk that some independent farm planners may be reluctant to require robust enough mitigation actions to achieve the objectives of the plan. This may in turn lead to farm planners withdrawing from the farm planning certification, reducing the pool available for getting the NRPs and FEPs completed.

In addition, PC1 adopts an implicit assumption that the third parties will be motivated to achieve the objectives of the plan. This may be in conflict with the motivation to assist their clients to be as commercially successful as possible. This risk will be managed by monitoring the results of the certified professional audit process.

11 Cost and resourcing summary

This section will be updated once the Council has made decisions on funding for the 2017/18 Annual Plan.

12 Funding options analysis

This section will be updated once the Council has made decisions on funding for the 2017/18 Annual Plan.

13 HRWO implementation programme

The following pages set out a programme of work for the next 10 years, identifying the key groups of activities, and when they are expected to occur.

The programme also identifies the critical dates in the first schedule process, and the critical dates for actions to have been completed under the current wording of the PC1.

HRWO Implementation Programme		FY 16/17				FY17/18				FY18/19			
Version	v6	2016		2017		2018		2019		2019		2019	
Status	Draft	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Last update	9/02/2017												
HRWO policy process													
Plan notification	Complete	Notification											
Submissions process	In progress	[Yellow bar]											
Submissions close	Planned	[Yellow bar]											
Summary of submissions	Indicative	[Yellow bar]											
Further submissions	Indicative	[Yellow bar]											
Negotiation / hearings process	Indicative	[Yellow bar]											
Decisions issued	Indicative	[Yellow bar]											
Appeals lodged	Indicative	[Yellow bar]											
Environment court appeals process	Indicative	[Yellow bar]											
HRWO delivery timeframes by schedule / rule													
Schedule A - Registration		[Yellow bar]											
Schedule B - Nitrogen reference point		[Yellow bar]											
Schedule C - Stock exclusion		[Yellow bar]											
Rule 3.11.5.1 - Small and low intensity farming activities	Immediate effect	[Yellow bar]											
Rule 3.11.5.2 - Other farming activities (low-risk properties)	Immediate effect	[Yellow bar]											
Rule 3.11.5.3 and 3.11.5.4 - Farm environment plans	PA until 2020	[Yellow bar]											
Rule 3.11.5.5 - Existing commercial vegetable production	PA until 2020	[Yellow bar]											
Rule 3.11.5.6 - Use of land for farming activities	Immediate effect	[Yellow bar]											
Rule 3.11.5.7 - Land use change	Immediate effect	[Yellow bar]											
HRWO implementation													
Implementation plan													
Finalise implementation plan		[Blue bar]											
Plan effectiveness, monitoring and science													
Water quality monitoring review and infrastructure build		[Orange bar]											
Water quality monitoring - additional to existing		[Orange bar]											
Property scale mitigations monitoring		[Orange bar]											
Social, economic, cultural indicators review		[Orange bar]											
Social, economic, cultural indicators monitoring		[Orange bar]											
Reporting on results - LAWA review		[Orange bar]											
Reporting development - web based platform		[Orange bar]											
Reporting on results - public accounting system		[Orange bar]											
Farm environment and sub catchment plans													
Engagement to support registration, NRP and FEP submissions		[Green bar]											
Support NRP roll out		[Green bar]											
Template FEP, standards and protocols		[Green bar]											
Develop FEP, NRP, registration management system and processes		[Green bar]											
Development of subcatchment and lake catchment stories - tranche 1		[Green bar]											
Development of subcatchment and lake catchment stories - tranche 2		[Green bar]											
Development of subcatchment and lake catchment stories - tranche 3		[Green bar]											
Subcatchment engagement to deliver sub catchment/lake stories		[Green bar]											
Develop sub catchment plans and lake catchment plans		[Green bar]											
Implementation of edge of field sub catchment and lake catchment mitigations		[Green bar]											
Regulatory implementation and industry schemes													
Develop industry scheme approval processes and systems		[Teal bar]											
Approval of industry schemes		[Teal bar]											
Consent processing - controlled activity farming land use		[Teal bar]											
Consent processing - other		[Teal bar]											
Develop certification and assessment process for FEP planners and CFNA advisors		[Teal bar]											
Certification of CFNA advisors and FEP planners		[Teal bar]											
Develop audit protocols and system		[Teal bar]											
Investigate third party scheme for auditing FEP actions		[Teal bar]											
Auditing industry schemes		[Teal bar]											
Auditing certified advisors		[Teal bar]											
Auditing FEP actions		[Teal bar]											
Developing a risk based compliance framework		[Teal bar]											
Additional compliance monitoring and enforcement		[Teal bar]											
Supporting activities													
Scope portal and internal process and system change requirements and tools		[Purple bar]											
Develop web portal - for registration, NRPs and FEPs		[Purple bar]											
Develop web based accounting/data system		[Purple bar]											
Implement integration and consequential system changes		[Purple bar]											
Preparing for the next plan change													
Research - allocation discharge framework		[Grey bar]											
Development of allocation framework		[Grey bar]											
Communications, engagement support and change management													
Communications material to support engagement and marketing		[Pink bar]											
Marketing strategy		[Pink bar]											
Stakeholder engagement co-ordination support		[Pink bar]											
Project management													
		[Light green bar]											
Financial year		Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
		FY16/17			FY17/18				FY18/19				

HRWO Implementation Programme																			
Version	v6	Calendar year 3				Calendar year 4				Calendar year 5				Calendar year 6				Calendar year 7	
Status	Draft	2019		2020		2021		2022		2023									
Last update	9/02/2017	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4		
HRWO policy process																			
Plan notification	Complete																		
Submissions process	In progress																		
Submissions close	Planned																		
Summary of submissions	Indicative																		
Further submissions	Indicative																		
Negotiation / hearings process	Indicative																		
Decisions issued	Indicative																		
Appeals lodged	Indicative																		
Environment court appeals process	Indicative																		
HRWO delivery timeframes by schedule / rule																			
Schedule A - Registration																			
Schedule B - Nitrogen reference point																			
Schedule C - Stock exclusion																			
Rule 3.11.5.1 - Small and low intensity farming activities	Immediate effect																		
Rule 3.11.5.2 - Other farming activities (low-risk properties)	Immediate effect																		
Rule 3.11.5.3 and 3.11.5.4 - Farm environment plans	PA until 2020																		
Rule 3.11.5.5 - Existing commercial vegetable production	PA until 2020																		
Rule 3.11.5.6 - Use of land for farming activities	Immediate effect																		
Rule 3.11.5.7 - Land use change	Immediate effect																		
HRWO implementation																			
Implementation plan																			
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Plan effectiveness, monitoring and science																			
Water quality monitoring review and infrastructure build																			
Water quality monitoring - additional to existing																			
Property scale mitigations monitoring																			
Social, economic, cultural indicators review																			
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Reporting on results - LAWA review																			
Reporting development - web based platform																			
Reporting on results - public accounting system																			
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Engagement to support registration, NRP and FEP submissions																			
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Stakeholder engagement co-ordination support																			
Project management																			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4		
Financial year		FY19/20				FY20/21				FY21/22				FY22/23					

HRWO Implementation Programme

Version	v6	Calendar year 7		Calendar year 8		Calendar year 9		Calendar year 10					
		2023	2023	2024	2024	2025	2025	2026	2026				
Status	Draft	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4				
Last update	9/02/2017												
HRWO policy process													
Plan notification	Complete												
Submissions process	In progress												
Submissions close	Planned												
Summary of submissions	Indicative												
Further submissions	Indicative												
Negotiation / hearings process	Indicative												
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Appeals lodged	Indicative												
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Property scale mitigations monitoring													
Social, economic, cultural indicators review													
Social, economic, cultural indicators monitoring													
Reporting on results - LAWA review													
Reporting development - web based platform													
Reporting on results - public accounting system													
Farm environment and sub catchment plans													
Engagement to support registration, NRP and FEP submissions													
Support NRP roll out													
Template FEP, standards and protocols													
Develop FEP, NRP, registration management system and processes													
Development of subcatchment and lake catchment stories - tranche 1													
Development of subcatchment and lake catchment stories - tranche 2													
Development of subcatchment and lake catchment stories - tranche 3													
Subcatchment engagement to deliver sub catchment/lake stories													
Develop sub catchment plans and lake catchment plans													
Implementation of edge of field sub catchment and lake catchment mitigations													
Regulatory implementation and industry schemes													
Develop industry scheme approval processes and systems													
Approval of industry schemes													
Consent processing - controlled activity farming land use													
Consent processing - other													
Develop certification and assessment process for FEP planners and CFNA advisors													
Certification of CFNA advisors and FEP planners													
Develop audit protocols and system													
Investigate third party scheme for auditing FEP actions													
Auditing industry schemes													
Auditing certified advisors													
Auditing FEP actions													
Developing a risk based compliance framework													
Additional compliance monitoring and enforcement													
Supporting activities													
Scope portal and internal process and system change requirements and tools													
Develop web portal - for registration, NRPs and FEPs													
Develop web based accounting/data system													
Implement integration and consequential system changes													
Preparing for the next plan change													
Research - allocation discharge framework													
Development of allocation framework													
Communications, engagement support and change management													
Communications material to support engagement and marketing													
Marketing strategy													
Stakeholder engagement co-ordination support													
Project management													
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Financial year		FY23/24				FY24/25				FY25/26			

14 Glossary

In full	Abbreviation
Waikato Regional Council	WRC
Healthy Rivers Wai Ora	HRWO
Plan Change 1	PC1
Beef and Lamb New Zealand	B+LNZ
Business as usual	BAU
Capital expenditure	CAPEX
Certified farm environment planner	CFEP
Certified farm nutrient advisor	CFNA
Certified nutrient management advisor (certification of the NMACP program – see below)	CNMA
Direct cost	DC
Farm Environment Plan	FEP
Full time equivalent	FTE
Information communication technology	ICT
Information technology	IT
Integrated regional information system	IRIS
Land Air Water Aotearoa (www.lawa.org.nz)	LAWA
Land Environment Plan	LEP
Local Government Act	LGA
Land management advisor	LMA
Long Term Plan	LTP
Nitrogen reference point	NRP
Nutrient Management Advisor Certification Programme (run by the Fertiliser Association of New Zealand)	NMACP
Non-complying activity	NCA
Resource Management Act	RMA
Restriction discretionary activity	RDA
Sub-catchment plan	SCP
Waikato River Authority	WRA